

REMARKS

I. Status of the Claims

Claims 1-15 are pending.

Claims 13-15 are allowed.

Claim 30 is amended to change dependency.

Claims 4, 10 and 24 are cancelled.

Claims 18-23 and 25-37 are withdrawn.

II. Interview Summary

An interview was held on May 22, 2008 Examiner Brian S. Kwon; Dr. Joel Bernstein, the inventor. Alice O. Martin, applicant's representative of Barnes & Thornburg, participated by telephone.

Applicant thanked the examiner for allowing claims 13-15 but asked to include claims 16 and 17 also because these claims relate "methotrexate" which is in independent claim 13, which is allowed.

III. Claims are Enabled

Claims 1-9 and 11-12 were rejected because the examiner still objected to the claim term "a hepatotoxic compound." Previously the examiner admitted claims 1-9 and 11-12 are enabled:

for the specific hepatotoxic compound such as acetaminophen, methotrexate, atorvastatin, simvastatin, niacin, fluconazole, divalproex sodium, and valproic acid.

Office Action, May 25, 2007, page 2.

The examiner explains his current rejection as follows:

The relative skill of the artisan and the unpredictability of the pharmaceutical art are very high. To practice the instant invention to the claimed scope, applicant would have to (i) screen numerous possible compounds characterized as "hepatotoxic compound, (ii) assay to find out which compounds are able to induce hepatotoxicity at what concentration level and then (iii) extrapolate the test and result to the claimed invention. In other words, the instant invention necessitates for the skilled artisan to undergo an

exhaustive search for the embodiments suitable to practice the claimed invention.

Office Action, page 4.

Further justifying the rejection:

compounds...claimed (*are*) ...highly unpredictable state of the art, and the insufficient amount of guidance present in the specification, one of ordinary skill in the art would be burdened with undue "painstaking experimentation study" to make/use the claimed "hepatotoxic compound" that would be enabled in this specification. (*sic*)

Office Action, page 5.

The examiner believes "the diagnosis of hepatotoxicity remains a difficult task..." (Office Action, page 3). However, there is no need to use the invention to determine whether a compound is hepatotoxic. The claims do **not** include the elements on which the examiner bases his rejection (e.g., "screen...hepatotoxic compounds," "assay...") The intent is to use "compounds at doses known to be hepatotoxic"; so the rejection explained on pages 3-4 of the Office Action is misplaced. (see [0007]) Claim 1 is amended to clarify scope.

As applicant explained during the interview and in written responses, the invention does **not** require making independent evaluation of a drug hepatotoxicity. Rather, the invention relates methods and compositions to alleviate adverse effects of hepatotoxicity. As Dr. Bernstein explained, those of skill in the art have at their finger tips, multiple sources with which to determine if drugs are hepatotoxic and to learn which drugs are known to be hepatotoxic. It is for those drugs the methods and compositions disclosed are useful.

Examples of sources for hepatotoxic drugs are in Exhibits A, B, D and D.

In Exhibit A, "Guidance for Industry, Drug-Induced Liver Injury: Premarketing Clinical Evaluation," U.S. Department of Health and Human Service, FDA, CDER, CBER, Drug Safety (October, 2007), there is guidance how to identify drugs "likely to cause significant hepatotoxicity," (p. 1). The importance of alleviating hepatotoxicity and

examples of drugs that are hepatotoxic, is in the Background, pp. 2-3 (see also Hy's Law, p. 4)

Stedman's Medical Dictionary defines "hepatotoxic" and "hepatotoxin" (Exhibit B).

Harrison's "Principles of Internal Medicine," 14th Ed., McGraw-Hill, provides a laundry list of drugs known to cause "diffuse hepatocellular damage" (p. 427) (see, for example, "Acetaminophen Hepatotoxicity (Direct Toxin)", p. 1694, (Exhibit C)).

Exhibit D illustrates warnings of hepatotoxicity of various drugs. This information is provided regularly to those of skill in the art (see for example FDA warnings against acetaminophen, darunavir. Guidance for detecting hepatotoxicity is also currently highly topical in Europe.

Exhibit E is excerpts from the well known Physicians Desk Reference®. (see warnings against Tasmar®, Methotrexate, Nizoral®, Depakote®, Tracleer®, Mycamine®, Crestor®, Mobic®, Viramune®, Remicade®, Vivitrol®, Timentin®, Niaspan®, Dantrium®, Soriatane®, Mylotarg® and Gleevec®.

IV. Other Issues

Claims 5 and 11 were amended to change "or" to "and" in Markush groupings.

The examiner wanted the folic acid of claim 7 added to claim 1 based on [0007], but the "basic and novel characteristics" of the invention are not altered by adding folic acid to the composition of claim 1. Without claim 7, claim 1 is still patentable, and [0007] says folic acid "can" be added (optional) "to further mitigate." The basic and novel aspects remain "mitigating the hepatotoxic properties." Therefore, claim 7 remains unamended.

No other fees are believed due at this time, however, please charge any deficiencies or credit any overpayments to deposit account number 12-0913 with reference to our attorney docket number (41959-102739).

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Alice O. Martin".

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Exhibit A

Guidance for Industry Drug-Induced Liver Injury: Premarketing Clinical Evaluation

DRAFT GUIDANCE

This guidance document is being distributed for comment purposes only.

Comments and suggestions regarding this draft document should be submitted within 60 days of publication in the *Federal Register* of the notice announcing the availability of the draft guidance. Submit comments to the Division of Dockets Management (HFA-305), Food and Drug Administration, 5630 Fishers Lane, rm 1061, Rockville, MD 20852. All comments should be identified with the docket number listed in the notice of availability that publishes in the *Federal Register*.

For questions regarding this draft document contact (CDER) Ruyi He at 301-796-0910, (CDER) Thomas Moreno at 301-796-2247, or (CBER) Bruce Schneider at 301-827-8343.

U.S. Department of Health and Human Services
Food and Drug Administration
Center for Drug Evaluation and Research (CDER)
Center for Biologics Evaluation and Research (CBER)

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Drug Safety

Guidance for Industry Drug-Induced Liver Injury: Premarketing Clinical Evaluation

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**U.S. Department of Health and Human Services
Food and Drug Administration
Center for Drug Evaluation and Research (CDER)
Center for Biologics Evaluation and Research (CBER)**

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Guidance for Industry¹ Drug-Induced Liver Injury: Premarketing Clinical Evaluation

This draft guidance, when finalized, will represent the Food and Drug Administration's (FDA's) current thinking on this topic. It does not create or confer any rights for or on any person and does not operate to bind FDA or the public. You can use an alternative approach if the approach satisfies the requirements of the applicable statutes and regulations. If you want to discuss an alternative approach, contact the FDA staff responsible for implementing this guidance. If you cannot identify the appropriate FDA staff, call the appropriate number listed on the title page of this guidance.

I. INTRODUCTION

This guidance is intended to assist the pharmaceutical industry and other investigators who are conducting new drug development in assessing the potential for a drug² to cause *severe* liver injury (i.e., fatal, or requiring liver transplantation). In particular, the guidance addresses how laboratory measurements that signal the potential for such drug-induced liver injury (DILI) can be obtained and evaluated during drug development. This evaluation is important because most drugs that cause severe DILI do so infrequently; typical drug development databases with up to a few thousand subjects exposed to a new drug will not show any cases. Databases do, however, often show evidence of a drug's *potential* for severe DILI if the clinical and laboratory data are properly evaluated for evidence of lesser injury that may not be severe, but may predict the ability to cause more severe injuries. This guidance describes an approach that can be used to distinguish signals of DILI that identify drugs likely to cause significant hepatotoxicity from signals that do not suggest such a potential. This guidance does not address issues of preclinical evaluation for potential DILI, nor the detection and assessment of DILI after drug approval and marketing.

FDA's guidance documents, including this guidance, do not establish legally enforceable responsibilities. Instead, guidances describe the Agency's current thinking on a topic and should be viewed only as recommendations, unless specific regulatory or statutory requirements are

¹ This guidance has been prepared by the Division of Gastroenterology Products, the Office of Medical Policy, and the Office of Surveillance and Epidemiology in the Center for Drug Evaluation and Research (CDER) in cooperation with the Center for Biologics Evaluation and Research (CBER) at the Food and Drug Administration (FDA).

² This guidance uses the term *drug or product* to refer to all products, except whole blood and blood components, regulated by CDER and CBER, including vaccines, and uses the term *approval* to refer to both drug approval and biologic licensure.

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cited. The use of the word *should* in Agency guidances means that something is suggested or recommended, but not required.

II. BACKGROUND: HEPATOTOXICITY

Hepatotoxicity has been the most frequent single cause of safety-related drug marketing withdrawals for the past 50 years (e.g., iproniazid), continuing to the present (e.g., ticrynafen, benoxaprofen, bromfenac, troglitazone, nefazodone). Hepatotoxicity discovered after approval for marketing also has limited the use of many drugs, including isoniazid, labetalol, trovafloxacin, tolcapone, and felbamate (Temple 2001). Several drugs have not been approved in the United States because European marketing experience revealed their hepatotoxicity (e.g., ibufenac, perhexiline, alpidem). Finally, some drugs were not approved in the United States because premarketing experience provided evidence of potential toxicity (e.g., dilevalol, tasosartan, ximelagatran). Although most significant hepatotoxins have caused predominantly hepatocellular injury, indicated by leakage of aminotransferase (AT) enzymes from injured liver cells without prominent evidence of hepatobiliary obstruction, the pattern of injury can vary. Many drugs cause cholestasis, but in general this condition is reversible after administration of the offending drug has stopped. Cholestatic injuries are less likely to lead to death or transplant, although there have been exceptions.

Drugs cause liver injuries by many different mechanisms. These injuries resemble almost all known liver diseases and there are no pathognomonic findings, even upon liver biopsy, that make diagnosis of DILI certain. Therefore, when possible DILI is suspected, it is essential to gather additional clinical and laboratory information, to observe the time course of the injury, and to seek alternative causes of the liver injury, such as acute viral hepatitis A, B, or C, autoimmune or alcoholic hepatitis, biliary tract disorders, and circulatory problems of hypotension or right heart congestive failure that may cause ischemic or hypoxic hepatopathy. It is also prudent to assess the subject for previously existing liver disease, such as chronic hepatitis C or nonalcoholic steatohepatitis (NASH), that may or may not have been recognized before exposure to the experimental drug.

Only the most overt hepatotoxins can be expected to show cases of severe DILI in the 1,000 to 3,000 subjects typically studied and described in a new drug application (NDA). Overtly hepatotoxic agents (e.g., carbon tetrachloride, chloroform, methylene chloride) are toxic to anyone receiving a large enough dose, and drugs that cause such predictable and dose-related injury generally are discovered and rejected in preclinical testing. More difficult to detect is toxicity that is not predictable or clearly dose-related, but seems to depend on individual susceptibilities that have, to date, not been characterized. Most of the drugs withdrawn from the market for hepatotoxicity have had rates of death or transplantation in the range of ≤ 1 per 10,000, so that a single case of such an event would not be reliably found even if several thousand subjects were studied. Cases of severe DILI have rarely been seen in drug development programs of significantly hepatotoxic drugs.

What are regularly seen during drug development are mild liver injuries, often laboratory signals without any symptoms. The problem is that both drugs capable of severe DILI and drugs that

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patients. The degree of AT elevation may be a better indicator of potential for severe DILI, but the most specific indicator is evidence of altered liver function.

As noted, a typical NDA or BLA database usually will not show any cases of severe DILI, even for a drug that can cause such injury. Many drugs, however, including both significant hepatotoxins and drugs that do not cause severe liver injury, cause laboratory evidence of hepatic injury, with leakage of liver enzymes and the appearance in blood of elevations in serum AT to levels of 3-, 5-, and greater times the upper limits of normal (ULN). Generally, ALT is considered a more liver-specific aminotransferase than AST, although it also occurs in many tissues (Green and Flamm 2002). The finding of a higher rate of such elevations in drug-treated subjects than in a control group is a sensitive signal of a potential to cause severe DILI, but it is not a very specific signal. A more specific signal of such potential is a higher rate of more marked peak AT elevations (10x-, 15xULN), with cases of increases >1,000 U/L causing increased concern. The single clearest (most specific) predictor found to date of a drug's potential for severe hepatotoxicity, however, is evidence of reduced overall liver function in one or more subjects, manifested by increased serum total bilirubin (TBL), in conjunction with AT elevation, not explained by any other cause, together with an increased rate of AT elevation in the overall study population compared to control.

Recognition of the importance of altered liver function, in addition to liver injury, began with Hyman Zimmerman's observation that drug-induced hepatocellular injury (i.e., aminotransferase elevation) accompanied by jaundice had a poor prognosis, with a 10 to 50 percent mortality from acute liver failure (in pretransplantation days) (Zimmerman 1978, 1999). The reason for this now seems clear. The liver has a large excess of bilirubin-excreting capacity; injury to hepatocytes sufficient to cause jaundice or near jaundice (i.e., a bilirubin >2 mg/dL) represents an extent of damage so great that recovery may not be possible in some patients. Zimmerman's observation that hepatocellular injury sufficient to impair bilirubin excretion was ominous has been used at the Food and Drug Administration (FDA) over the years to identify drugs likely to be capable of causing severe liver injury, as distinct from drugs that cause lesser hepatocellular injury (i.e., AT elevation without bilirubin elevation) but are not as likely to cause severe injury (e.g., aspirin, tacrine, heparin). The observation of the critical importance of altered liver function has been referred to informally as *Hy's Law* (Temple 2001; Reuben 2004).

Briefly, Hy's Law cases have the following three components:

1. The drug causes hepatocellular injury, generally shown by more frequent 3-fold or greater elevations above the ULN of ALT or AST than the (nonhepatotoxic) control agent or placebo.
2. Among subjects showing such AT elevations, often with ATs much greater than 3xULN, some subjects also show elevation of serum TBL to >2xULN, without initial findings of cholestasis (serum alkaline phosphatase (ALP) activity >2xULN).
3. No other reason can be found to explain the combination of increased AT and TBL, such as viral hepatitis A, B, or C, preexisting or acute liver disease, or another drug capable of causing the observed injury.

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Finding one Hy's Law case in clinical trials is ominous; finding two is highly predictive of a potential for severe DILI. Clinical trials of the beta blocker dilevalol (enantiomer of labetalol, a diastereoisomeric mixture), showed two such cases in about 1,000 exposures. The drug was not approved in the United States, and examination of a postmarketing study in Portugal revealed fatal liver injury. Clinical trials of tasosartan, an angiotensin II blocking agent, showed a single Hy's Law case. The manufacturer was asked to do a large-scale safety study before the drug could be approved. The study was never conducted.

As a rule of thumb, based on Zimmerman's original estimate of 10 to 50 percent mortality associated with hepatocellular injury sufficient to impair the liver bilirubin excretory function, severe DILI can be estimated to occur at a rate of at least one-tenth the rate of so-called Hy's Law cases (Temple 2001). This observation was recently confirmed in large studies of DILI in Spain (Andrade and Lucena et al. 2005) and in Sweden (Björnsson and Olsson 2005) in which approximately 10 percent of subjects with hyperbilirubinemia or jaundice died or needed liver transplants.

Recent examples of some drugs causing idiosyncratic hepatotoxicity (e.g., bromfenac, troglitazone, ximelagatran) further illustrate the predictive value of Hy's Law, where findings during clinical trials were noted and severe DILI occurred after marketing. These examples are described in detail in Appendix A.

Past experience, including the three examples, shows that there is a set of laboratory abnormality signals that have the ability to predict a potential for severe DILI with reasonable sensitivity and specificity in a database of several thousand subjects. Although it is not yet possible to provide precise specificity and sensitivity estimates for the various signals, guidance can be provided on use of these major indicators of a potential for severe DILI, as follows:

- **An excess of AT elevations to >3xULN compared to a control group**

AT elevations to >3xULN are relatively common and may be seen in all groups, but an excess of these elevations compared to a control group is nearly always seen for drugs that ultimately prove severely hepatotoxic at relatively high rates (1/10,000). Therefore, the sensitivity of an excess of >3xULN AT elevations as a predictor of a potential for severe DILI is high. But many drugs show this signal without conferring a risk of severe injury (e.g., tacrine, statins, aspirin, heparin), indicating low specificity for an excess of AT elevations alone. There are no good data analyses at this time on how great this excess should be compared to control (e.g., 2-fold, 3-fold) to suggest an increased risk of DILI.

- **Marked elevations of AT to 5x-, 10x-, or 20xULN in smaller numbers of subjects in the test drug group and not seen (or seen much less frequently) in the control group**

Virtually all severely hepatotoxic drugs show such cases, indicating high sensitivity for predicting severe DILI, but, again, some drugs such as tacrine and others that are not severely hepatotoxic also can cause AT elevations to this degree, so that specificity of this finding is suboptimal.

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- One or more cases of elevated bilirubin to $>2\times\text{ULN}$ in a setting of pure hepatocellular injury (no evidence of obstruction, such as elevated ALP in gall bladder or bile duct disease, malignancy), with no other explanation (viral hepatitis, alcoholic or autoimmune hepatitis, other hepatotoxic drugs), accompanied by an overall increased rate of AT elevations $>3\times\text{ULN}$ in the test drug group compared to placebo

The sensitivity of this observation appears high for any given rate of severe DILI if enough people are exposed to the drug. Thus, if the true incidence of severe injury is $1/10,000$, and the rate of Hy's Law cases is $1/1,000$, about 3,000 subjects (*Rule of 3*) would be needed to have a 95 percent probability of observing a Hy's Law case in the treated population (Rosner 1995). The sensitivity of this finding appears very high if at least two cases are seen (e.g., dilevalol, bromfenac, troglitazone, ximelagatran). We are not aware of false positive Hy's Law findings. Therefore, the finding of two Hy's Law cases, and probably even one, is a strong predictor of a significant rate of severe liver injury. Failure to find a case, however, does not imply that a drug with AT elevations is free of a risk of severe DILI. The degree of assurance depends on the population exposed for a long enough time and on the rate of severe DILI that would be of interest.

The implications of these three findings may be different in patients with existing liver disease such as fatty liver disease, NASH, or chronic hepatitis C or B, with bilirubin metabolism abnormalities (Gilbert's syndrome), and in patients on drugs that treat liver disease or that inhibit bilirubin glucuronidation, such as indinavir or atazanavir (Zhang and Chando et al. 2005).

IV. CLINICAL EVALUATION OF DILI

A. General Considerations

For most drugs in development that reach phase 3 testing, the chances of encountering severe DILI are low. An increased frequency of mild hepatotoxicity (AT elevations) in early trials usually results in heightened screening to detect and evaluate liver injury during phase 3 testing. It is critical, however, to determine whether mild hepatotoxicity reflects a potential for severe DILI or reflects a capacity for only limited injury. To make this distinction, it is essential to detect any cases of more severe injury and to examine such cases closely, observing the course and outcome of the injury, and seeking additional information that might identify other causes. The following general recommendations for evaluating and monitoring potential drug-induced hepatotoxicity may not be suitable for all situations and should be modified for special populations, such as people with preexisting liver disease or malignancies, and in light of accumulating data. In addition, clinical trials of cellular and gene therapies and of vaccines pose specific challenges related to trial size and design, persistence of vectors, and tissue specificity. Applicants are encouraged to discuss these issues with the review division.

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1. Patients with Liver Abnormalities or Disease

Patients are sometimes excluded from clinical trials because of baseline liver test abnormalities or a history of liver disease, but there is no well-established reason to do this, except perhaps to avoid confusion between the previous disease and an effect of the test drug. These patients generally should be included in at least the phase 3 trials because they are likely to be treated with the drug if it is marketed. Preexisting liver disease is not known to make patients more susceptible to DILI (Zimmerman 1978, 1999), but it may be that a diminished *liver reserve* or the ability to recover could make the consequences of injury worse, making it appear that such patients were more susceptible to severe DILI. If the drug is intended to be prescribed or marketed to such patients after approval, they should be studied during controlled trials. It may be prudent, however, to first determine if DILI occurs in people with previously normal livers, before studying patients with well-characterized and stable chronic liver disease.

2. Detection of DILI

In general, early studies of a drug in study subjects with presumably normal liver function should involve obtaining liver tests every 2 to 4 weeks, at least for a few months. It is uncertain whether early symptoms (e.g., anorexia, nausea, fatigue, right upper abdominal discomfort, vomiting) precede or follow the first laboratory signs of hepatic injury (rising ALT, AST, or ALP) and the pattern of clinical and laboratory changes may vary with different drugs and recipients. In most cases, however, the first evidence of a problem is elevated AT or ALP. In longer trials, if there is no sign of liver injury after a reasonable length of exposure (e.g., 3 months), the monitoring interval can be increased to once every 2 to 3 months. Later trials also can use less frequent liver chemistry monitoring if there is no indication of hepatotoxicity.

If symptoms compatible with DILI precede knowledge of serum abnormalities, liver enzyme measurements should be made immediately, regardless of when the next visit or monitoring interval is scheduled. In some cases, symptoms may be an early sign of injury. Reliance on early symptoms, rather than serum enzyme monitoring, has become the standard for monitoring isoniazid therapy for prophylaxis of tuberculosis and seems to prevent severe liver injury if acted upon promptly (Nolan and Goldberg et al. 1999). Attention to symptoms does not supplant routine periodic assessment of AT, TBL, and ALP in trials of investigational drugs.

3. Confirmation

In general, an increase of serum AT to $>3\times\text{ULN}$ should be followed by repeat testing within 48 to 72 hours of all four of the usual serum measures (ALT, AST, ALP, and TBL) to confirm the abnormalities and to determine if they are increasing or decreasing. There also should be inquiry about symptoms. Serum AT may rise and fall quite rapidly, and waiting a week or two before obtaining confirmation of elevations may lead to a false conclusion that the initially observed abnormality was spurious, or, of greater concern, to severe worsening if the initial abnormality was the herald of a severe reaction to follow. The need for prompt repeat testing is especially great if AT is much greater than $3\times\text{ULN}$ or TBL is greater than $2\times\text{ULN}$. For outpatient studies, or studies in which subjects are far away from the study site, it may be difficult for the subjects to return to the study site promptly. In this case, the subjects should be retested locally, but

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normal laboratory ranges should be recorded, results should be made available to study investigators immediately, and the data should be included in the case reports. If symptoms persist or repeat testing shows AT $>3 \times \text{ULN}$ for the subjects with normal baseline measures or 2-fold increases above baseline values for subjects with elevated values before drug exposure, it is appropriate to initiate close observation to determine whether the abnormalities are improving or worsening.

4. Close Observation

Close observation is defined as follows:

- Repeating liver tests two or three times weekly. Frequency of retesting can decrease to once a week or less if abnormalities stabilize or study drug has been discontinued and subject is asymptomatic.
- Obtaining a more detailed history of symptoms and prior or concurrent diseases.
- Obtaining a history of concomitant drug use (including nonprescription medications, herbal and dietary supplement preparations), alcohol use, recreational drug use, and special diets.
- Obtaining a history of exposure to environmental chemical agents.
- Obtaining additional tests to evaluate liver function, as appropriate (e.g., International Normalized Ratio (INR)).
- Considering gastroenterology or hepatology consultation.

It is critical to initiate close observation immediately upon detection and confirmation of early signals of possible DILI, and not to wait until the next scheduled visit or monitoring interval. A threshold of a greater than $3 \times \text{ULN}$ aminotransferase level is reasonable, as lesser elevations are common and nonspecific. If additional testing is done, beyond that specified in the study protocol, it is important that the subject's information be added to the case report forms or database.

5. Decision to Stop Drug Administration

It has been observed that *dechallenge* (stopping drug administration) does not always, or even usually, result in immediate improvement in abnormal lab values. Abnormal test values and symptoms may progress for several days or even weeks after discontinuation of the drug that caused the abnormality. For example, rising TBL usually follows serum AT increases by a few days to weeks. The primary goal of close observation is to determine as quickly as possible whether observed abnormal findings are transient and will resolve spontaneously or are progressive. For most DILI, no specific antidotes are available (except N-acetylcysteine for acute acetaminophen overdose if given promptly, and, possibly, intravenous carnitine for valproic acid hepatotoxicity). Promptly stopping administration of the offending drug usually is the only potentially effective therapy.

A difficult question is when to stop administration of the investigational drug. Because transient rises and falls of ALT or AST are common, and progression to severe DILI or acute liver failure is uncommon, automatic discontinuation of study drug upon finding a greater than $3 \times \text{ULN}$

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elevation of ALT or AST may be unnecessary. For most people, the liver appears capable of adapting to injury by foreign chemical substances, which may render a person tolerant to the drug despite continuation of exposure. Stopping a drug at the first hint of mild injury does not permit learning whether adaptation will occur, as it does for drugs such as tacrine that cause liver injury but do not cause severe DILI. On the other hand, continuing drug administration too long can be dangerous once there is marked transaminase elevation or evidence of *functional* impairment appearing after hepatocellular injury, as indicated by rising bilirubin or INR, which represent substantial damage. Although there is no published consensus on when to stop a drug in the face of laboratory abnormalities, and the decision will be affected by information on related drugs, the accumulating clinical experience, the nature of the patient, and many other factors, the following can be considered a basic guide. In general, treatment should be stopped if:

- ALT or AST >8xULN
- ALT or AST >5xULN for more than 2 weeks
- ALT or AST >3xULN and (TBL >2xULN or INR >1.5)
- ALT or AST >3xULN with the appearance of worsening of fatigue, nausea, vomiting, right upper quadrant pain or tenderness, fever, rash, or eosinophilia

6. Evaluating Data for Alternative Causes

One of the critical purposes of close observation is to gather additional clinical information to determine the most likely cause or causes of the observed abnormalities, and specifically, whether there is a cause other than the study drug, such as one of the following common causes. Other less common causes also may need to be considered.

- **Acute viral hepatitis.** The usual onset of hepatocellular DILI is indistinguishable from acute viral hepatitis A or B. Hepatitis C is much less often acute in its onset and tends to be insidious, but it sometimes can resemble acute drug injury. The presence of acute viral hepatitis A, B, and C should always be evaluated by serological markers. Viral hepatitis D (requires concomitant hepatitis B infection) and E are relatively rare in the United States. Hepatitis E is more common in developing countries, including Southeast Asia, and should be considered in recent travelers to those countries. Also rare is liver injury caused by Epstein-Barr virus and cytomegalovirus, although this is seen more commonly in immuno-suppressed individuals. Adolescent and young adult patients with possible DILI should be tested for Epstein-Barr virus. Hepatitis is common among transplant patients with CMV disease.
- **Alcoholic and autoimmune hepatitis.** Acute alcoholic hepatitis usually is recurrent, with a history of binge exposure to alcohol preceding episodes, and it has some characteristic features, such as associated fever, leukocytosis, right upper quadrant pain and tenderness, and AST >ALT, that may help distinguish it from other causes of liver injury. Autoimmune hepatitis may be acute or even fulminant in its onset; it does not always respond immediately to corticosteroids, but may have serological markers of value. Alcoholic and autoimmune hepatitis should be assessed by history and serologic testing (e.g., antinuclear antibodies).

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- **Biliary tract disorders.** Biliary tract disease more often causes cholestatic injury initially and should be investigated with gall bladder and ductal ultrasound study, especially if ALP is increased. Malignant interruption of the biliary tract also should be considered.
- **Cardiovascular causes.** Cardiovascular disease, especially right heart failure and hypotension, may cause acute centrilobular hypoxic cell necrosis (*ischemic hepatitis*) with spectacular increases of serum AT (e.g., AT >10,000). Cardiovascular dysfunction, including hypotension or right heart failure, should be assessed by physical examination and history.

Exclusion of the two ABCs (i.e., viral hepatitis A, B, or C; alcoholic or autoimmune hepatitis, biliary disorders, and circulatory disorders) as causes of liver injury should be attempted in all cases of suspected DILI, and the results should be recorded. There is a practical limit as to how much testing should be done to exclude less common liver diseases, such as acute Wilson's disease or alpha-1-antitrypsin deficiency.

It is also critical to discover concomitant treatment that might be responsible for injury. Many people take multiple drugs, perhaps less often in controlled clinical trials because of exclusion criteria, but subjects may not report taking disallowed drugs or other agents. The possible exposure to potentially toxic herbal or dietary supplement mixtures of unknown composition, nonprescription medications such as acetaminophen, or to occupational chemical agents may not be volunteered unless subjects are specifically questioned.

7. Follow-Up to Resolution

All study subjects showing possible DILI should be followed until all abnormalities return to normal or to the baseline state. DILI may develop or progress even after the causative drug has been stopped. Results should be recorded on the case report form and in the database. Note that still longer follow-up can sometimes reveal an off-drug repetition of what had appeared to be DILI, indicating that liver injury was related to an underlying liver disease.

8. Rechallenge

Whether or not to rechallenge a subject who showed mild DILI is a difficult question. Re-exposure may initiate a sometimes explosive and more severe reaction, as was observed with halothane several decades ago. Some cases of DILI show indicators of immunological reaction such as eosinophilia, rash, fever, or other symptoms or findings, and it is possible that such cases are more prone to recur with re-exposure. On the other hand, most people can adapt to xenobiotic substances such as new drugs and develop tolerance for them, as has been found even for drugs that can cause severe injury, such as isoniazid. The large majority of people showing hepatocellular injury on isoniazid recover fully or recover while continuing to take the drug, and some, but not all, can resume or continue taking the drug without further adverse consequence. If such tolerance develops, the use of rechallenge to verify drug causation would give a false negative result.

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Generally, rechallenge of subjects with significant ($>5\times\text{ULN}$) AT elevations should not be attempted. If such subjects are rechallenged, they should be followed closely. Rechallenge can be considered if the subject has shown important benefit from the drug and other options are not available or if substantial accumulated data with the test drug do not show potential for severe injury. The subject should be made aware of the potential risk, and consent to the rechallenge.

9. Research Opportunities

It is not known why only a few people show severe DILI in response to a hepatotoxic drug while others show nothing or seem to adapt. The current thinking is that there may be a genetic basis for such differences, but acquired factors may be equally important. The period of close observation provides a major opportunity to gather and store serial samples of blood and urine, to investigate characteristics of subjects who show evidence of mild or severe DILI, and to see how they differ from each other and from people who do not show any effects despite being similar in age, sex, and drug exposure. These serial samples can be studied by genomic, proteomic, and metabolomic methods to determine how subjects differ, and to seek biomarkers that identify the susceptible persons.

As part of the Critical Path Initiative,³ the FDA is working with industry, academia, and other experts to broaden our understanding of the biochemical and genetic bases of DILI. In June 2006, the FDA co-sponsored a scientific workshop to determine the feasibility of developing a mathematical (in-silico) model for DILI from which other predictive experimental models can be derived to characterize potential hepatotoxicity. The long-term goal is to develop a model, or models, that can help researchers identify criteria for determining when early clinical intervention (i.e., stopping the drug) is appropriate. It is also hoped that predictive bioassays and biomarkers can be identified that will help determine which patients most likely will suffer liver toxicity from specific compounds.

This urgently needed research is not a regulatory requirement, but is an important opportunity. At present, we are able only to search among patients with drug-induced injury to predict what might happen to others. Ideally, we should seek to identify individuals at increased risk before administering a drug that they cannot tolerate. The goal is to be able to identify persons who should never be exposed to a given drug because they are idiosyncratically hypersusceptible to, or unable to recover from, DILI caused by it. If tests that screen for people susceptible to severe DILI can be developed, a hepatotoxic drug could remain available to people who are not susceptible to severe DILI, instead of having to withdraw the drug from the market, allowing no one to benefit from it.

In addition, identification of common genotypic characteristics among patients experiencing DILI in response to one or more class-related hepatotoxic agents might permit the development of in vitro or ex vivo tests or genetically altered animal strains that can be used to better predict serious hepatotoxic potential, or the lack thereof, of new drugs belonging to the same or closely related classes.

³ See <http://www.fda.gov/oc/initiatives/criticalpath>.

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B. Case Report Forms

In addition to collecting information on laboratory abnormalities, clinical symptoms, and the potential cause of any hepatic illness, case report forms should include the following information for cases in which liver injury is found (including control subjects with such injury):

- Time and date from start of drug administration to start of illness
- Time and date of cessation of drug, or interruption of drug administration
- Space for recording free text to describe the course of illness, including abnormalities of aminotransferases, ALP, and TBL
- Risk factors, especially alcohol use history
- Use of all concomitant drugs (dose, start and stop dates, whether drug is known to be hepatotoxic, rechallenge and dechallenge information)
- Evaluation of nondrug causes: recent hepatitis A, B, and C serology, evidence for biliary obstruction, acute alcoholic hepatitis (AST >2xALT), recent history of severe hypotension or congestive heart failure, underlying other viral disease
- Rechallenge and dechallenge information with suspect drug, with details of time and dose
- All supplemental information, including tests in local laboratories, unscheduled tests and physical exam reports, consultation reports, narrative information, and special studies

Any potential Hy's Law case should be handled as a serious unexpected adverse event associated with the use of the drug and reported to the FDA promptly. Reporting should include all available information and should initiate a close follow-up until complete resolution of the problem and completion of all attempts to obtain supplementary data.

C. Interpretation of Signals of DILI or Acute Liver Failure

1. Frequency and Magnitude of Liver AT Abnormalities

The presence of even a single case of severe liver failure resulting from treatment in the premarketing clinical trials database is an indicator of a high level of hepatotoxic risk. More commonly, however, there will be no identifiable cases of severe liver injury, but rather varying degrees of serum AT abnormalities that need to be interpreted. As previously noted, slight abnormalities of this kind (to <3xULN) are common in untreated and placebo-treated subjects and are not informative about the potential for the development of severe DILI.

Therefore, it has become standard practice to look at greater deviations, such as AT values $\geq 3x$ -, $5x$ -, or $10xULN$. Because these abnormalities can occur in placebo-treated groups, it is important to compare their rate in drug-exposed subject groups relative to control groups (i.e., placebo or products that do not cause elevation of transaminases). An excess of AT abnormalities $>3xULN$ is a signal of a potential for severe DILI, but, even though it has high sensitivity, it is not specific. Comparison of rates of AT elevations during drug treatment to a control group is probably less critical for abnormalities of greater magnitude (e.g., $10xULN$), as such elevations are rarely seen spontaneously. Therefore, these greater AT elevations can be examined in the whole clinical trials database, not just in the controlled trials. It should be appreciated that serum AT activity is a relatively volatile measurement, often rising and falling

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within days. It cannot be concluded from one measurement that a peak value has been seen, so that detection of an abnormal rise is a call for serial measures to determine which way the abnormality is moving, whether increasing or decreasing.

A number of factors may confound interpretation of AT abnormalities seen in NDA or BLA databases. Although the more extreme AT elevations may be better predictors of toxicity than smaller elevations, it is possible that close monitoring could affect the magnitude of abnormalities seen if it leads to earlier cessation of drug treatment that prevents the greater abnormalities from appearing. In addition, the contribution of drug treatment to an exacerbation of preexisting liver disease may be difficult to determine. Finally, normalization of abnormalities on continued treatment is not proof that the abnormality was not drug-caused, but may result from liver adaptation to the drug.

2. Combined Elevations of Aminotransferases and Bilirubin

When AT abnormalities indicating hepatocellular injury are accompanied by evidence of impaired hepatic function (bilirubin elevation $>2\times\text{ULN}$), in the absence of evidence for biliary obstruction (i.e., significant elevation of ALP) or some other explanation of the injury (e.g., viral hepatitis, alcohol hepatitis), the combined finding (i.e., Hy's Law cases) represents a signal of a potential for severe DILI. Experience has indicated that the occurrence of even one or two well-documented cases of this combination is ominous, indicating a likelihood that the drug will cause severe liver injury.

The absence of Hy's Law cases in an NDA or BLA database may allow an estimate of an upper limit of the rate for severe DILI, using the Rule of 3 derived from simple binomial calculation. There will be at least a 95 percent chance of seeing one or more cases of DILI in 3n study subjects if its true incidence is 1 in n subjects, and the group is well observed. Thus, if no cases of AT and bilirubin elevations are seen in 3,000 well-observed subjects, it can be concluded with 95 percent confidence that the true rate of such occurrences is not more than 1 per 1,000. This calculation would then suggest a rate of expected severe liver injury ≤ 1 per 10,000 exposed patients, assuming that the rate of severe injury when AT and TBL are both elevated is about 10 percent (Andrade and Lucena et al. 2005; Björnsson and Olsson 2005).

D. Analysis of Signals of DILI

Based on our experience, we recommend that the following analyses related to liver injury potential be carried out and included in an NDA or BLA, or included in an investigational new drug application when DILI is suspected and being evaluated.

1. Assessment of Drug Metabolism

The metabolism of a drug can have serious consequences for the safety profile of the drug. A drug may be metabolized to a hepatotoxic metabolite (e.g., acetaminophen, halothane, and isoniazid). Most hepatotoxic drugs have been oxidatively metabolized by the CYP450 system.

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Several in vitro methods are available to detect and quantify binding for a drug or its metabolites to liver proteins, including radiochemical and immunological methods.

2. Assessment of Liver-Related Adverse Events in Controlled Trials

Analysis of incidence rates of liver-related adverse events (abnormal AT, bilirubin, and ALP levels) seen in subjects in controlled trials with at least one dose of drug exposure should be provided, generally for pooled data, although study-to-study differences may be of interest. Rates can be given as the number of events per number of subjects exposed, or as the number of events per subject-years of exposure, preferably both. For many drugs, it appears that a minimum duration of exposure is required before DILI occurs. Therefore, it is useful to give the rates of liver-related adverse events for subjects who have had the minimum duration of exposure (e.g., rate in subjects with at least 1-month exposure). Rates for pooled data should include, but are not limited to:

- 3x-, 5x-, 10x-, and 20xULN elevations of AST, ALT, and either ALT or AST.
- Any elevations of bilirubin; elevated bilirubin to >1.5xULN, and to >2xULN.
- Any elevations of ALP >1.5xULN.
- Elevation of AT (>3xULN) accompanied by elevated bilirubin (>1.5xULN, >2xULN).
- Possibly liver-related deaths and liver-related treatment discontinuations. These cases should be described and time-to-event analyses should be performed. Follow-up status also should be provided. There should be a description of any histologic and rechallenge data.

All rates should be calculated separately for drug-, placebo-, and active-controlled groups. Normal ranges for all tests should be provided. Time-to-event analyses for elevated rates of significant individual events (e.g., elevated AT, bilirubin) should be provided. The contribution of sex, age, risk factors, and drug dose or regimen to the abnormalities seen should be explored.

3. Assessment of Liver-Related Adverse Events in the Entire Clinical Trials Database

Analysis of rates of liver-related adverse events (abnormal AT, bilirubin, and ALP levels) for the total clinical trials database, including subjects with exposure of at least one dose of study drug in phase 1 or phase 2 trials, or in uncontrolled, open label, extension trials should be provided. We recommend the same evaluation as for the controlled trials database discussed in section IV.D.2. Time-to-event analyses, mortality rates, study withdrawals, and similar data should be provided for significant abnormalities. The contribution of sex, age, and drug dose or regimen to the abnormalities seen should be explored.

4. Assessment of Hy's Law Cases in the Clinical Trials Database

NDA and BLA submissions should include a listing of possible Hy's Law cases identified by treatment group (e.g., subjects with any elevated AT of >3xULN, ALP <2xULN, and associated with an increase in bilirubin ≥ 2 xULN). A narrative summary for each Hy's Law case should be provided. Narrative summaries should not only provide, in text format, the data that are already

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presented in the case report tabulation, but also should provide a complete synthesis of all available clinical data and an informed discussion of the case, allowing for a better understanding of what the subject experienced. For a narrative summary to be useful, it should contain the following information:

- Subject's age, sex, weight, and height
- Discussion of signs and symptoms related to hepatotoxicity: type and timing
- Relationship of exposure duration and dose to the development of the liver injury
- Pertinent medical history
- Concomitant medications with dates and doses
- Pertinent physical exam findings
- Test results (e.g., laboratory data, biopsy data and reports, with dates and normal ranges)
- Time course of serum enzyme and bilirubin elevations
- A summary of all available clinical information including, if known:
 - Prior or current history of ethanol use
 - Evidence for pre- or co-existing viral hepatitis, or other forms of liver disease
 - Symptoms and clinical course including follow-up to resolution
 - Special studies, radiologic examinations, liver biopsy results
 - Presence or absence of possible confounders, including concomitant illness, use of concomitant medications that are known hepatotoxins, such as acetaminophen
- Discussion of hepatotoxicity as supported by available clinical data and overall assessment of treating physician, consultants, and applicants as to the likelihood of DILI
- Treatment provided
- Dechallenge and rechallenge results, if done
- Outcomes and follow-up information
- Copies of hospital discharge summaries, pathology and autopsy reports

The availability of liver biopsy, explant, or autopsy slides for pathology review by review staff or external expert consultants has been helpful in the FDA's assessment of such cases. Reports of external consultant opinions solicited by the applicant should be provided to the FDA.

Complete narrative summaries that include the components previously listed also should be provided for all subjects who died of hepatic illness, or who discontinued study drugs for hepatotoxicity, including subjects with abnormalities consistent with protocol-specific stopping rules.

5. Overall Assessment of a Drug's Potential to Cause DILI

The overall assessment should characterize a drug's potential for DILI and should consider at least the following questions:

- Was liver monitoring sufficiently frequent and thorough to characterize DILI risk?
- Were there any cases of probably drug-induced serious or severe DILI?
- Were there signals of a potential for DILI (e.g., AT elevations, Hy's Law cases) and how were these signals assessed?

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- What doses and durations of exposure were associated with hepatotoxicity signals?
- What approximate incidence of mild, moderate, and severe DILI could be expected postmarketing?
- Is the trial information sufficient to inform an overall risk-benefit assessment?
- Was there sufficient drug exposure (i.e., number of study subjects and duration of treatment of each study subject) and adequate liver test monitoring to reliably set an upper boundary for risk of severe DILI after marketing?
- What rate of severe injury (assuming Hy's Law cases occur at about 10 times the rate of severe injury) has been suggested or has been ruled out (e.g., no Hy's Law cases in 3,000 subjects implies a rate of such cases of $<1/1,000$ and thus a rate of severe DILI of $<1/10,000$)? This consideration should reflect the presence or absence of other signals, such as marked elevations of AT.
- Will some form of monitoring, by symptoms or serum testing, be needed? Usually, this would be considered only if there was evidence of severe liver injury or the potential for it. If so, effectiveness of monitoring in the NDA database should be discussed.

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APPENDIX A: ILLUSTRATIVE EXAMPLES OF DILI

Duract (bromfenac)

Bromfenac was a nonsteroidal anti-inflammatory drug (NSAID) studied for both short-term analgesia and long-term arthritis treatment. There was little evidence of hepatotoxicity in the short-term analgesic trials, but during longer term clinical trials in arthritis, ALT elevations $>3\times\text{ULN}$ were seen in 2.8 percent of patients on bromfenac, compared to none in placebo group. Among 1,195 exposed patients, there were two cases in which there was elevated TBL as well as AT elevation in the clinical trial data submitted for review in the NDA. Concerns about possible liver toxicity led to the approval of bromfenac in July 1997 for short-term use only and not for osteoarthritis or rheumatoid arthritis. As an NSAID, however, it was prescribed long-term off-label in arthritic patients, and severe hepatotoxicity emerged. Within 6 months of approval, reports of severe hepatic failure, including two cases requiring liver transplant, were received. All severe cases involved the use of bromfenac for more than 10 days, the maximum duration of treatment recommended in the labeling.

In response, the FDA and the manufacturer strengthened the warnings in the package insert with a boxed warning, and issued a Dear Health Care Professional letter. Despite these efforts, the manufacturer and the FDA continued to receive reports of severe injuries, including reports of death or need for liver transplantation (Moses and Schroeder et al. 1999; Hunter and Johnston et al. 1999; Rabkin and Smith et al. 1999; Fontana and McCashland et al. 1999). Given the availability of other NSAIDs of equal effectiveness and safety, bromfenac was withdrawn from the market in June 1998. The two Hy's Law cases in the long-term-exposed population of about 1,000 subjects during drug development predicted an occurrence of severe hepatotoxicity during chronic use at a rate of about 1/5,000 to 10,000 people. Following approval, rates of acute liver failure for bromfenac were estimated to be in the range of 1/10,000 (Goldkind and Laine 2006).

Rezulin (troglitazone)

Troglitazone was approved by the FDA in January 1997 for the treatment of Type 2 diabetes mellitus. In reviews of the clinical trials of troglitazone conducted before approval there were no cases of liver failure among 2,510 subjects exposed to the drug in the NDA database, but 1.9 percent of troglitazone-treated subjects had ALT $>3\times\text{ULN}$ compared to 0.3 percent of placebo-treated subjects, 1.7 percent had ALT $>5\times\text{ULN}$, and 0.2 percent (5 subjects) had ALT $>30\times\text{ULN}$ (2 subjects in the last group also experienced jaundice). The median duration of troglitazone therapy before peak ALT elevation was 121 days. In the Diabetes Prevention Trial at the National Institutes of Health (NIH) performed after approval, 4.3 percent of 585 troglitazone-treated subjects had ALT $\geq 3\times\text{ULN}$, 1.5 percent had ALT $>8\times\text{ULN}$, and 2 subjects had ALT $>30\times\text{ULN}$, compared to 3.6 percent of subjects with ALT $\geq 3\times\text{ULN}$ in the placebo group (Knowler and Hamman et al. 2005). One of the subjects with ALT $>30\times\text{ULN}$ developed liver failure and died, despite receiving a liver transplant. The second subject recovered. These data suggest that the rate of severe liver injury would be about 1 in 3,000 to 10,000.

After marketing, there were numerous reports (Gitlin and Julie et al. 1998; Vella and deGroen et al. 1998; Herrine and Choudary 1999) of acute liver failure associated with troglitazone use, and

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four letters were sent to practicing physicians between 1997 and 1999, urging monthly monitoring and careful use. These letters did not significantly affect the monitoring done by physicians, and AT monitoring recommended in the Dear Health Care Professional letters and in the package insert was not regularly performed (Graham and Drinkard et al. 2001). Moreover, an analysis of 94 cases of liver failure reported spontaneously to the FDA showed that the progression from normal hepatic test results to irreversible liver injury occurred in less than a month (the recommended monitoring interval) in 19 patients. The onset of injury began after 3 days to more than 2 years of troglitazone use (Graham and Green et al. 2003a; Graham and Drinkard et al. 2003b). Time from jaundice to hepatic encephalopathy, liver transplantation, or death usually was rapid, averaging 24 days. Troglitazone was withdrawn from the United States market in March 2000, when other agents (rosiglitazone, pioglitazone) with similar efficacy but little or no hepatotoxicity became available.

Apart from constituting another example of the predictive value of evidence of hepatocellular injury accompanied by even two cases of elevated bilirubin, there were other lessons learned from the troglitazone experience: 1) monitoring recommendations, even after several warning letters to all practicing physicians, may not be well followed; and 2) some cases of severe hepatotoxicity occur rapidly, within less than a reasonable and practical recommended interval for monitoring, indicating that monitoring would provide at best only partial protection, even if recommendations were followed. In addition, following the withdrawal of troglitazone, many companies began to search for toxigenomic answers to determining individual susceptibility to DILI, and a national network was funded by NIH in 2003 to study the problem (Watkins 2005).

Exanta (ximelagatran)

Exanta (ximelagatran), an oral anticoagulant (antithrombin), was not marketed in the United States because of hepatotoxicity and other concerns discovered during clinical trials. Issues related to potential liver toxicity of ximelagatran were presented and discussed at an FDA advisory committee meeting in September 2004 (He 2004). During short-term clinical trials of the drug for prevention of thromboembolic complications after joint replacement surgical procedures, there was no increased rate of transaminase elevations in the ximelagatran group compared to the enoxaparin-warfarin group, and no serious hepatotoxicity was seen. But in longer-term (>35 days) trials in patients with chronic atrial fibrillation to prevent embolic or thrombotic strokes, an increase in ALT >3xULN occurred in 7.6 percent of 6,948 patients compared to 1.1 percent of patients receiving warfarin treatment; and 1.5 percent of ximelagatran-treated patients had ALT >10xULN.

Increases in AT typically occurred 1 to 6 months after the initiation of ximelagatran administration with peak levels within 2 to 3 months post-randomization. Among the 531 ximelagatran patients with ALT >3xULN, 39 percent completed the study on treatment, while 61 percent discontinued the drug. Almost all patients with ALT >3xULN returned to <2xULN whether the drug was stopped or not, although the return to normal was faster if ximelagatran was stopped. Of 18 patients who resumed drug after ALT returned to normal, only 2 had elevations recur. Concomitant elevations of ALT >3xULN and bilirubin >2xULN were observed in 37 of about 7,000 patients, at least 13 of whom had no alternative explanation for the concomitant ALT and bilirubin elevation. Nine of the 37 patients died, but the deaths were not

Contains Nonbinding Recommendations

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clearly hepatotoxicity-related in most cases. Only one autopsy was done and it showed a small, friable and diffusely mottled liver suggestive of severe diffuse hepatic necrosis, but liver failure from ximelagatran might have contributed to some of the other deaths (He 2004; Lewis 2006; Kaplowitz 2006; Senior 2006; Temple 2006). Because severe hepatotoxicity was observed in an orthopedic surgery trial in an extended treatment of 35 days, Exanta was withdrawn in February 2006 from the 22 countries in which it had been approved, and further development in the United States was abandoned.

Again, short-term tolerance of ximelagatran, with resolution of even substantial elevations of ALT in most cases did not predict long-term safety. The relatively high rate of Hy's Law cases, about 0.2 percent or 1/500 (13 cases among 7,000 exposed patients), predicted the occurrence of severe hepatotoxicity, at a rate of about 1/5,000 (10 percent of the rate of Hy's Law cases). In fact, at least one death occurred among the 7,000 exposed patients subsequent liver toxicity, further supporting such an estimate.

Serial No. 10/813,760

Exhibit B

Stedman's

MEDICAL DICTIONARY

25th Edition

ILLUSTRATED



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hepatomphalocele (hep'-a-tom-fal'-ô-sel, hep'-a-tom-fâ-lô-sel) [hepato- + omphalocele]. Hepatomphalos: umbilical hernia with involvement of the liver.

hepatomphalos (hep'-a-tom-fâ-lôs). Hepatomphalocele.

hepatonecrosis (hep'-a-tô-ne-kro'-sis). Death of liver cells.

hepatonephric (hep'-a-tô-nef-rik). Hepatonephros.

hepatonephromegaly (hep'-a-tô-nef-rô-meg'-â-lê) [hepato- + G. *nephros*, kidney, + *megas*, great]. Enlargement of both liver and kidney or kidneys.

hepatopathic (hep'-a-tô-path'-ik). Damaging the liver.

hepatopathy (hep'-a-tô-path'-ê) [hepato- + G. *pathos*, suffering]. Disease of the liver.

hepatoperitonitis (hep'-a-tô-pâr'-itô-nî-tis). Perihepatitis.

hepatopetal (hep'-a-tô-pet'-al). Toward the liver, usually referring to the normal direction of portal blood flow.

hepatopexy (hep'-a-tô-pek'-sê) [hepato- + G. *pêxis*, fixation]. Anchoring of the liver to the abdominal wall.

hepatophyma (hep'-a-tô-fî-mâ) [hepato- + G. *phyma*, tumor]. Rounded or nodular tumor of the liver.

hepatopneumonic (hep'-a-tô-nû-mon'-ik) [hepato- + G. *pneumônîkos*, pulmonary]. Hepaticopulmonary; hepatopulmonary: relating to the liver and the lungs.

hepatoportal (hep'-a-tô-pôr'-âl). Relating to the portal system of the liver.

hepatoptosis (hep'-a-tô-pô'-sis, tô-tô'-sis) [hepato- + G. *ptôsis*, a falling]. Wandering liver: a downward displacement of the liver.

hepatopulmonary (hep'-a-tô-pûl'-mô-nâr'-ê). Hepatopneumonic.

hepatorenal (hep'-a-tô-rê-nâl) [hepato- + L. *renalis*, renal, fr. *renes*, kidneys]. Hepatonephric; relating to the liver and the kidney.

hepatorrhagia (hep'-a-tô-râ'-jê-â) [hepato- + G. *rhêgnyî*, to burst forth]. Hemorrhage into or from the liver.

hepatorrhaphy (hep'-a-tô-râ'-fê) [hepato- + G. *rhapê*, a suture]. Suture of a wound of the liver.

hepatorrhea (hep'-a-tô-rê-â) [hepato- + G. *rhoia*, a flow]. Obsolete term for cholorrhea.

hepatorrhixis (hep'-a-tô-rek'-sis) [hepato- + G. *rhêxis*, rupture]. Rupture of the liver.

hepatoscopy (hep'-a-tôs'-kô-pê) [hepato- + G. *skopê*, to examine]. Examination of the liver.

hepatosplenitis (hep'-a-tô-splê-nî-tis). Inflammation of the liver and spleen.

hepatosplenography (hep'-a-tô-splê-nôg'-fê). Hepatolienography; the use of a contrast medium to outline or depict the liver and spleen roentgenographically.

hepatosplenomegaly (hep'-a-tô-splê-nô-meg'-â-lê) [hepato- + G. *splên*, spleen, + *megas*, large]. Hepatosplenomegaly: enlargement of the liver and spleen.

hepatosplenopathy (hep'-a-tô-splê-nôp'-â-thê). Disease of the liver and spleen.

hepatostomy (hep'-a-tô-sô-mê) [hepato- + G. *stoma*, mouth]. Establishment of a fissure into the liver.

hepatotherapy (hep'-a-tô-thâr'-pê). 1. Treatment of disease of the liver. 2. Therapeutic use of liver extract or of the raw substance of the liver.

hepatotomy (hep'-a-tô-tô-mê) [hepato- + G. *tomê*, incision]. Incision into the liver.

hepatotoxemia (hep'-a-tô-tô-sê-mê-â) [hepato- + G. *toxikon*, poison, + *haima*, blood]. Autointoxication assumed to be due to improper functioning of the liver.

hepatotoxic (hep'-a-tô-tôk'-sik). Relating to an agent that damages

the liver, or pertaining to any such action.

hepatotoxin (hep'-a-tô-tôk'-sik). A toxin that is destructive to parenchymal cells of the liver.

Hepatozoon (hep'-a-tô-zôn) [hepato- + G. *zôon*, animal]. A genus of coccidian parasites (family Haemogregarinidae), in which schizogony occurs in the visceral organs, gametogony in the leukocytes or erythrocytes of vertebrate animals, and sporogony in certain ticks and other blood-sucking invertebrates. *H. canis* occurs in dogs, cats, jackals, and hyenas, but is most pathogenic in dogs, in which it may cause serious disease and death; other species have been described from rats, mice, rabbits, and squirrels.

hepta- [G. *hepta*, seven]. Prefix denoting seven.

heptabarbitral (hep'-â-bar'-bi-lawl). 5-(1-Cyclohepten-1-yl)-5-ethylbarbituric acid; a short-acting barbiturate that produces sedation, hypnosis, or anesthesia, depending upon the dose administered.

heptad (hep'-tad). A septivalent chemical element or radical.

heptaminol (hep-tam'-in-ol). 6-Amino-2-methyl-2-heptanol; a sympathomimetic, vasoconstrictor, and cardiotonic.

heptanal (hep'-â-nâl). Enanthal; heptaldehyde; $\text{CH}_3(\text{CH}_2)_5\text{CHO}$, obtained from the ricinoleic acid of castor oil by chemical means; used in the manufacture of ethyl oenanthe, a constituent of many artificial essences (flavors).

heptazone hydrochloride (hep'-â-zôn). Phenadoxone hydrochloride.

heptose (hep'-tôs). A sugar with 7 carbon atoms in its molecule; e.g., sedoheptulose.

heptulose (hep'-tôs). Ketoheptose.

D-altra-2-heptulose. Sedoheptulose.

D-manno-heptulose. A ketoheptose of the mannose configuration, occurring in the urine of individuals who have eaten a large quantity of avocados.

Herbert, Herbert, British ophthalmic surgeon, 1865-1942. See H's operation.

herbivorous (her-biv'-ô-rûs) [L. *herbu*, herb, + *voro*, to devour]. Feeding on plants.

Herbst, Ernst F.G., German anatomist, 1803-1893. See H's corpuscles.

herd. 1. A group of people or animals in a given area. 2. An immunologic concept of an ecologic composite that includes susceptible animal species (including man), vectors, and environmental factors.

hereditary (hê-rêd'-i-ter-ê) [L. *hereditarius*: fr. *heres* (hered-), an heir]. Transmitted from parent to offspring; derived from ancestry obtained by inheritance.

heredity (hê-rêd'-i-ter-ê) [L. *hereditas*, inheritance, fr. *heres* (hered-), an heir]. The transmission of characters from parent to offspring.

heredo- [L. *heres*, an heir]. Prefix denoting heredity.

heredoataxia (hê-rê-dô-â-tak'-sê-â). Hereditary spinal ataxia.

heredofamilial (hê-rê-dô-fâ-mîl'-ê-â). Obsolete term denoting an inherited condition present in more than one member of a family.

heredopathia atactica polynuriiformis (hê-rê-dô-path'-ê-â-tak'-i-kâ-pôl'-ê-nû-ri-i-fô-r-mis). Relsum's disease.

Herelle, Felix H. See d'Herelle, Felix H.

Herellea (hê-rêl'-ê-â). A bacterial generic name which has been officially rejected because its type species, *H. vaginicola*, is a member of the genus *Acinetobacter*.

Hering, Heinrich Ewald, German physiologist, 1866-1948. See H's nerve of H; H-Breuer reflex; Traube-H. curve.

Hering, Karl E.K., German physiologist, 1834-1918. See H's test-theory; canal of H; Traube-H. curves; waves; Semon-H. theory.

heritability (her'-i-tâ-bîl'-i-ter-ê) [see heredity]. 1. In intelligence or per-

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Exhibit C

**14TH
EDITION**

Harrison's

**PRINCIPLES of
INTERNAL
MEDICINE**

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Clinical Manifestations of Adverse Reactions to Drugs

VII. RESPIRATORY MANIFESTATIONS

Airway obstruction (bronchospasm, asthma; see also anaphylaxis)
 Adenosine
 Beta blockers
 Cephalosporins
 Cholinergic drugs
 NSAIDs, e.g., aspirin, indomethacin
 Penicillins
 Pentazocine
 Streptomycin
 Tazartine (drugs with yellow dye)

Cough
 ACE inhibitors
 Nasal congestion
 Decongestant abuse
 Guafenesin
 Isoproterenol
 Oral contraceptives
 Reserpine
 Pulmonary edema
 Contrast media
 Heroin
 Hydrochlorothiazide
 Interleukin 2
 Methadone
 Propoxyphene

Pulmonary hypertension
 Fenfluramine
 Pulmonary infiltrates
 Acyclovir
 Amiodarone
 Azathioprine
 Bleomycin
 Busulfan
 Carmustine (BCNU)
 Chlorambucil
 Cyclophosphamide
 Gold
 Melphalan
 Methotrexate

Pulmonary infiltrates (cont.)
 Methysergide
 Mitomycin C
 Nitrofurantoin
 Procarbazine
 Sulfonamides
 Respiratory depression
 Aminoglycosides
 Hypnotics
 Opiates
 Polymyxins
 Sedatives
 Trimethaphan

VIII. GASTROINTESTINAL MANIFESTATIONS

Cholestatic hepatitis
 Acetohexamide
 Anabolic steroids
 Androgens
 Chlorpropamide
 Clavulanic acid/amoxicillin
 Cyclosporine
 Erythromycin estolate
 Flucloxacillin
 Gold salts
 Methimazole
 Nitrofurantoin
 Oral contraceptives
 Phenothiazines
 Constipation or ileus
 Aluminum hydroxide
 Barium sulfate
 Calcium carbonate
 Ferrous sulfate
 Ganglionic blockers
 Ion exchange resins
 Opiates
 Phenothiazines
 Tricyclic antidepressants
 Verapamil
 Diarrhea or colitis
 Antibiotics (broad-spectrum)
 Clindamycin
 Cocaine
 Colchicine
 Digitalis
 Guafenesin
 Lactose excipients
 Lincomycin
 Magnesium in antacids
 Methylodopa
 Misoprostol
 Oral contraceptives
 Purgatives
 Reserpine
 Ticlopidine

Diffuse hepatocellular damage
 Acetaminophen (paracetamol)
 Acebutolol
 Allopurinol
 Aminosalicic acid
 Amiodarone
 Aprindine
 Carbenicillin
 Cyclophosphamide
 Dapsone
 Diclofenac
 Erythromycin estolate
 Ethionamide
 Felbamate
 Glyburide
 Halothane
 Isoniazid
 Ketoconazole
 Labetalol
 Lovastatin
 Methimazole
 Methotrexate
 Methoxyflurane
 Methylodopa
 Monamine oxidase inhibitors
 Niacin
 Nifedipine
 Nitrofurantoin
 Oxyphephenatin
 Phenytoin and other hydantoin
 Propoxyphene
 Propylthiouracil
 Pyridium
 Quinidine
 Rifampin
 Salicylates
 Sodium valproate
 Sulfonamides
 Tacrine
 Tetracyclines
 Trazodone
 Verapamil
 Zidovudine (AZT)

Gallstones/biliary pseudolithiasis
 Ceftriaxone
 Intestinal ulceration
 Solid KCl preparations
 Malabsorption
 Aminosalicic acid
 Antibiotics (broad-spectrum)
 Cholestyramine
 Colchicine
 Colestipol
 Cytotoxic agents
 Neomycin
 Phenobarbital
 Phenytoin
 Primidone
 Nausea or vomiting
 Digitalis
 Estrogens
 Ferrous sulfate
 Levodopa
 Opiates
 Potassium chloride
 Tetracyclines
 Theophylline
 Oral conditions
 Dental discoloration:
 Tetracycline
 Dry mouth:
 Anticholinergics
 Clonidine
 Levodopa
 Methylodopa
 Tricyclic antidepressants
 Gingival hyperplasia:
 Calcium antagonists
 Cyclosporine
 Phenytoin
 Salivary gland swelling:
 Bethanidine
 Brethium
 Clonidine

Oral conditions
 Salivary gland swelling (cont.)
 Guafenesin
 Iodides
 Phenylbutazone
 Taste disturbances:
 Acetazolamide
 Biguanides
 Captopril
 Griseofulvin
 Lithium
 Metronidazole
 Penicillamine
 Rifampin
 Ulceration:
 Aspirin
 Cytotoxic agents
 Gentian violet
 Isoproterenol (sublingual)
 Pancreatin
 Pancreatitis
 Asparaginase
 Azathioprine
 Didanosine
 Estrogens
 Ethacrynic acid
 Furosemide
 Glucocorticoids
 Mercaptopurine
 Opiates
 Oral contraceptives
 Pentamidine
 Sulfonamides
 Thiazides
 Valproic acid
 Peptic ulceration or hemorrhage
 Aspirin
 Ethacrynic acid
 Glucocorticoids
 NSAIDs†
 Reserpine (large doses)

(continued)

Table 296-2

Principal Alterations of Hepatic Morphology Produced by Some Commonly Used Drugs and Chemicals*

Principal Morphologic Change	Class of Agent	Example
Cholestasis	Anabolic steroid	Methyl testosterone
	Anti-inflammatory	Sulindac
	Antithyroid	Methimazole
	Antibiotic	Erythromycin estolate, nitrofurantoin, rifampin
	Oral contraceptive	Norethynodrel with mestranol
	Oral hypoglycemic	Chlorpropamide
	Tranquillizer	Chlorpromazine†
	Oncotherapeutic	Anabolic steroids, busulfan, tamoxifen
	Immunosuppressive	Cyclosporine
	Anticonvulsant	Carbamazepine
Fatty liver	Calcium channel blocker	Nifedipine, verapamil
	Antibiotic	Tetracycline
	Anticonvulsant	Sodium valproate
	Antiarrhythmic	Amiodarone
	Antiviral	Dideoxynucleosides (e.g., zidovudine)
	Oncotherapeutic	Asparaginase, methotrexate
	Anesthetic	Halothane‡
	Anticonvulsant	Phenytoin, carbamazepine
	Antihypertensive	Methyldopa,† captopril, enalapril
	Antibiotic	Isoniazid,† rifampin, nitrofurantoin
Hepatitis	Diuretic	Chlorothiazide
	Laxative	Oxphenisatin‡
	Antidepressant	Iproniazid, amitriptyline, imipramine
	Anti-inflammatory	Ibuprofen, indomethacin, diclofenac, sulindac
	Antifungal	Ketoconazole, fluconazole, itraconazole
	Antiviral	Zidovudine, dideoxy inosine
	Calcium channel blocker	Nifedipine, verapamil, diltiazem
	Antiandrogen	Flutamide
	Immunosuppressive	Azathioprine
	Lipid-lowering	Nicotinic acid, lovastatin
Mixed hepatitis/cholestatic Toxic (necrosis)	Hydrocarbon	Carbon tetrachloride
	Metal	Yellow phosphorus
	Mushroom	<i>Amanita phalloides</i>
	Analgesic	Acetaminophen
	Solvent	Dimethylformamide
	Anti-inflammatory	Phenylbutazone
	Antibiotic	Sulfanomides
	Xanthine oxidase inhibitor	Allopurinol
	Antiarrhythmic	Quinidine
	Anticonvulsant	Carbamazepine

* Several agents cause more than one type of liver lesion and appear under more than one category.

† Rarely associated with primary biliary cirrhosis-like lesion.

‡ Occasionally associated with chronic hepatitis or bridging hepatic necrosis or cirrhosis.

angiosarcoma of the liver. Oral contraceptives have been implicated in the development of hepatic adenoma and, rarely, hepatocellular carcinoma and occlusion of the hepatic vein (Budd-Chiari syndrome). Another unusual lesion, peliosis hepatis (blood cysts of the liver), has been observed in some patients treated with anabolic steroids. The existence of these hepatic disorders expands the spectrum of liver

injury induced by chemical agents and emphasizes the need for a thorough drug history in all patients with liver dysfunction.

The following are the patterns of adverse hepatic reactions for some prototypic agents.

ACETAMINOPHEN HEPATOTOXICITY (DIRECT TOX.)

IN) Acetaminophen has caused severe centrilobular hepatic necrosis when ingested in large amounts in suicide attempts or accidentally by children. A single dose of 10 to 15 g, occasionally less, may produce clinical evidence of liver injury. Fatal fulminant disease is usually (although not invariably) associated with ingestion of 25 g or more. Blood levels of acetaminophen correlate with the severity of hepatic injury (levels above 300 µg/mL 4 h after ingestion are predictive of the development of severe damage, while levels below 150 µg/mL suggest that hepatic injury is highly unlikely). Nausea, vomiting, diarrhea, abdominal pain, and shock are early manifestations occurring 4 to 12 h after ingestion. Then 24 to 48 h later, when these features are abating, hepatic injury becomes apparent. Maximal abnormalities and hepatic failure may not be evident until 4 to 6 days after ingestion, and aminotransferase levels approaching 10,000 units are not uncommon. Renal failure and myocardial injury may be present.

Acetaminophen hepatotoxicity is mediated by a toxic reactive metabolite formed from the parent compound by the cytochrome P450 mixed-function oxidase system of the hepatocyte. This metabolite is detoxified by binding to glutathione. When excessive amounts of the metabolite are formed, glutathione levels in the liver fall, and the metabolite is covalently bound to nucleophilic hepatocyte macromolecules. This process is believed to lead to hepatocyte necrosis; the precise sequence and mechanism are unknown. Hepatic injury may be potentiated by prior administration of alcohol or other drugs, by conditions that stimulate the mixed-function oxidase system, or by conditions such as starvation that reduce hepatic glutathione levels. Cimetidine, which inhibits P450 enzymes, has the potential to reduce generation of the toxic metabolite. In chronic alcoholics, the toxic dose of acetaminophen may be as low as 2 g.

ⓧ TREATMENT

Treatment of acetaminophen overdosage includes gastric lavage, supportive measures, and oral administration of activated charcoal or cholestyramine to prevent absorption of residual drug. Neither of these agents appears to be effective if given more than 30 min after acetaminophen ingestion; if they are used, the stomach lavage should be done before other agents are administered orally. In patients with high acetaminophen blood levels (>200 µg/mL measured at 4 h or >100 µg/mL at 8 h after ingestion), the administration of sulphydryl compounds (e.g., cysteamine, cysteine, or N-acetylcysteine) appears to reduce the severity of hepatic necrosis. These agents appear to act by providing a reservoir of sulphydryl groups to bind the toxic metabolites or by stimulating synthesis and repletion of hepatic glutathione. Therapy should be begun within 8 h of ingestion but may be effective even if given as late as 24 to 36 h after overdose. Later administration of sulphydryl compounds is of uncertain value. Routine use of N-acetylcysteine has reduced substantially the occurrence of fatal acetaminophen hepatotoxicity. When given orally, N-acetylcysteine is diluted to yield a 5% solution. A loading dose of 140 mg/kg is given, followed by 70 mg/kg every 4 h for 15 to 20 doses. Treatment can be stopped when plasma acetaminophen levels indicate that the risk of liver damage is low.

Survivors of acute acetaminophen overdose usually have no evidence of hepatic sequelae. In a few patients, prolonged or repeated administration of acetaminophen in therapeutic doses appears to have led to the development of chronic hepatitis and cirrhosis.

HALOTHANE HEPATOTOXICITY (IDIOSYNCRATIC REACTION) Administration of halothane, a nonexplosive fluorinated hydrocarbon anesthetic agent that is structurally similar to chloroform, results in severe hepatic necrosis in a small number of individuals, many of whom have previously been exposed to this agent. The failure to produce similar hepatic lesions reliably in animals, the rarity of hepatic impairment in human beings, and the delayed appearance

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Exhibit D

FDA panel wants stronger acetaminophen warnings

A US advisory panel has recommended that explicit warnings about the possibility of liver toxicity should be added to all packs of OTC products containing acetaminophen (paracetamol). Although the risk of hepatotoxicity with the product is low statistically, in numerical terms it is high, with several hundred people dying each year. McNeil Consumer & Specialty Products, which presented data showing that the drug is safe at the recommended dosages, has already decided to add such a warning to its top-selling Tylenol line.

The US FDA's non-prescription drugs advisory committee met on September 19th for the first day of a two-day session to review the safety of several OTC analgesics, beginning with acetaminophen. Panelists said all OTC products in which acetaminophen is an active ingredient, such as cough-cold medicines, should clearly state this on the front of the pack.

However, except in the case of high alcohol use, it decided that there was insufficient information to require warnings about a higher risk of liver damage due to other possible risk factors, such as underlying liver disease, use of other drugs or malnourishment.

Acetaminophen labelling currently instructs users who consume three or more alcoholic drinks a day to ask their doctor whether they should take acetaminophen or other pain relievers/fever reducers. However, the committee said the specific warning about hepatotoxicity associated with acetaminophen should be kept separate from this instruction, so that users would not conclude that only alcohol consumption can lead to liver damage.

... hepatotoxicity risk

Annual overdoses associated with acetaminophen result in 56,000 emergency department visits each year, including 26,000 hospitalisations and more than 400 deaths, reported Dr William Lee, professor of liver disease at the University of Texas Southwestern Medical Center in Dallas. However, Dr Debra Bowen, McNeil's vice-president for R&D, noted that more than 100 million Americans consume acetaminophen preparations each year. "Harm is rare," she said.

Dr Lee said about two-thirds of the overdoses were suicide attempts. Nevertheless, more than 2,000 hospitalisations and 100 deaths a year can be attributed to unintentional acetaminophen-associated overdoses, he said. The FDA asked the advisory committee to focus on these cases, on the assumption that label and pack changes could not reduce the number of suicide attempts.

That assumption was challenged by Dr Peter Lurie of the US consumer advocacy organisation, Public Citizen. "In fact, many countries have sought to address the problem of suicides or 'intentional overdoses,'" he said. In the UK, for example, an experiment implemented in September 1998 restricted the number of acetaminophen tablets per pack to 16 in supermarkets and 32 in pharmacies, primarily through the use of blister packs. "Although one can buy several packs, prescriptions are required to obtain more than 100 tablets."

Early evaluation of the programme has shown decreases in total and severe acetaminophen overdoses as well as decreases in acetaminophen-overdose liver transplants and deaths, although the results are not completely consistent between studies, Dr Lurie said.

A member of the audience rose to inform the committee that acetaminophen sales in the UK had dropped by half

since the restrictions came into effect. Aspirin sales also declined, but the use of other analgesics, including ibuprofen, had doubled, he said. Dr Charles Ganley, director of the FDA's division of OTC drug products, said the agency would have to have good justification to restrict pack sizes in the same way. Such a move would need clearances from numerous bodies, such as the White House Office of Management and Budget. "And if we don't have data to support that, it's very difficult to impose it on someone," Dr Ganley said.

... lack of information

Unintended overdosing is usually caused by lack of information, the committee was told. The mother of a young man who died of liver failure after taking acetaminophen plus codeine and then OTC acetaminophen said that everyone had thought it was safe.

"We continue to meet doctors who are unaware of the frequency of acetaminophen toxicity," she said. "Most people know about stomach problems and bleeding associated with NSAIDs. Why aren't they aware of acetaminophen liver problems?"

Dr Susan Winckler, vice-president and staff counsel of the American Pharmaceutical Association, said a study by the National Council on Patient Information and Education (NCPIE) on OTC medications had found that only 34% of consumers read label information about the active ingredient, and only 21% read the warnings section.

Only 28% of parents and other "caregivers" were aware that OTCs could have side-effects, and only 36% could name a possible side-effect for a given medication. Most panelists wanted the FDA, which does not regulate OTC advertising, to recommend to the Federal Trade Commission, which does, that it require acetaminophen manufacturers to warn of liver toxicity in their TV and print ads.

In the US, the recommended dose of acetaminophen for adults is 4g per day. McNeil consultant Dr Richard Dart, director of the Rocky Mountain Poison & Drug Center in Colorado, said prospective studies indicate no toxicity at or near the recommended dose. The studies also showed that serious hepatotoxicity occurs following substantial overdose, either a single dose of about 15g or multiple doses of around 12g/day.

However, Dr Claudia Karwowski of the FDA's Office of Drug Safety found 23 cases of severe liver injury with acetaminophen at doses of 4g or less per day in the FDA's Adverse Event Reporting System (AERS) database. Ten of these cases were associated with alcoholism or alcohol use, three with regular alcohol use, 13 with liver problems, and three with poor nutrition status.

Dr Karwowski said it was difficult to draw conclusions from these cases, as there was no certainty that the dosing information was reliable or that the cases were unintentional. On the other hand, the FDA estimates that only 1-10% of adverse events are reported to it, she said.

This cancer drug has just another step II. I need to know when it's likely to be successful. What's the chance of success?

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from which the company reported results in November (*Script* No 3316, p 19). It met its primary endpoint, median time to onset of relief of symptoms, with a 20 units/kg dose – 30 minutes versus 1.5 hours with placebo. A 10 units/kg dose showed a trend towards improvement which did not reach significance, but CSL declined to give the precise data.

The trial also met all its secondary endpoints, including worsening of symptoms and time to complete resolution of HAE symptoms.

There are no specifically approved therapies in the US for HAE, a genetic disorder thought to affect up to 75,000 people in the US and Europe that causes recurrent attacks of inflammation in the extremities, face, urogenital tract, abdomen and larynx. Laryngeal attacks can be fatal.

It is caused by a deficiency of the plasma protein C1 esterase inhibitor, which in healthy people decreases activity of the complement and kallikrein systems which are responsible for the inflammation seen in the disorder.

Current treatments include anabolic steroids to prevent attacks, and pain control and rehydration, or antifibrinolytics such as tranexamic acid during attacks; however, patients often have to wait for the pain and swelling to subside. CSL has marketed C1-INH as Berninert in several European countries for 30 years including Germany, Austria and Switzerland. CSL said it had developed the product in the US after becoming aware of the growing unmet need there in recent years. The firm does have plans to file it in the EU, but declined to say when.

...competition

There are several products vying to become the first specifically approved treatment for HAE in the US. Lev Pharmaceuticals filed its candidate Cinryze in the US in August, while Jerini filed icatibant (proposed tradename Firazyr) in the US in October and in the EU last August. Pharming had a setback when its product Rhucin was rejected by the EU's CHMP in December (*Script* No 3322, p 21), but the firm has appealed the decision and plans to file Rhucin in the US later this year.

C1-INH, Cinryze and Rhucin are all C1-inhibitors, with the first two being derived from human plasma, while Rhucin is a transgenic product derived from rabbits' milk. Lev says its product goes through a further filtration process to eliminate contaminants, while Pharming says that Rhucin does not carry the same risk of contamination as plasma-derived products and is not limited by the availability of human blood.

Icatibant is a bradykinin B2 antagonist, working later in the inflammatory cascade – bradykinin is produced via kallikrein activation. Another candidate, Dyax's DX-88 (ecallantide), a plasma kallikrein inhibitor, is in a confirmatory Phase III trial.

C1-INH appears to compare well with the other candidates, which also had the primary endpoint of time to onset of symptom relief in clinical trials. This was 60 minutes with Rhucin versus 8.5 hours with placebo (*Script* No 3291, p 19), two hours for Cinryze versus over four hours with placebo (*Script* No 3283, p 21), and two hours with icatibant compared with 12 hours for tranexamic acid.

can result in fatalities when overdosed. Other approved cough products containing the narcotic ingredient are given every four to six hours, and the regulators continue to review safety information for those products.

Adverse event reports associated with Tussionex have included life-threatening side-effects and deaths in patients, including children, the regulators said. These reports reveal that physicians are sometimes prescribing, and patients are sometimes taking, more than the recommended dose or taking the medication more frequently than every 12 hours. The reports also show that Tussionex is sometimes prescribed or given to children less than six years old, for whom the medication is not approved.

Without careful measurement of the suspension, overdose can result in fatal respiratory depression. UCB has agreed to update the labelling to make it clear that Tussionex is contraindicated in children under six, and that accurate dosing is essential. The FDA urged that physicians and caregivers only use a medical syringe or other device designed to measure the suspension – and that household teaspoons or tablespoons vary in size and should not be used.

The company has said that five deaths have been reported in children under age six who took Tussionex since its approval in the US in 1987. Tussionex contains hydrocodone and the antihistamine chlorpheniramine in an extended-release form.

US liver warning for Prezista

Tibotec Therapeutics (Johnson & Johnson), in co-operation with the FDA, has alerted US doctors of changes to the "Warnings" section of the data sheet for its protease inhibitor, Prezista (darunavir), regarding the risk of hepatotoxicity. Prezista was introduced in the US in 2006 for the treatment of HIV/AIDS.

The alert was made in a Dear Healthcare Provider letter that has been posted on the FDA's Medwatch page. The letter notes that in clinical trials and postmarketing experience, drug-induced hepatitis (eg. acute hepatitis, cytolytic hepatitis) has been reported in patients receiving combination therapy with Prezista/ritonavir. Ritonavir is marketed by Abbott as Norvir.

The letter notes that the updated data sheet states under the heading "hepatotoxicity" that during clinical trials in 3,063 patients, drug-induced hepatitis was reported in 0.5% of patients receiving the combination. Patients with pre-existing liver dysfunction have an increased risk for liver function abnormalities.

That section of the data sheet now also notes: "Postmarketing cases of liver injury, including some fatalities, have been reported. These have generally occurred in patients with advanced HIV-1 disease taking multiple concomitant medications, having co-morbidities including hepatitis B or C co-infection, and/or developing immune reconstitution syndrome. A causal relationship with Prezista/ritonavir therapy has not been established." The number of postmarketing cases has not been provided in the updated label. Tibotec's letter states that appropriate laboratory tests should be conducted prior to initiating therapy with Prezista.

Europe

Swedish generics firms complain about substitution

The Swedish generic industry association, the FGL, has written to the Medical Products Agency complaining about the generic substitution list, which it says is becoming too restricted. A number of generic products have been excluded from the list because the MPA says they are not identical to the original, the FGL says.

Generic substitution was introduced in Sweden in October 2002. The MPA draws up a list of substitutable products, and pharmacists dispense the cheapest product they have in stock.

But the FGL says the system needs to be reviewed to ensure that the substitution criteria correspond with the intention of the law. It also wants the MPA to improve its communications with generics companies during the procedure for deciding on substitution status, in order to avoid obstacles to substitution.

It says the MPA has developed its own regulation separately from the original law, so that it is in charge of both the regulation and its implementation. The FGL points out that when generics companies applied for approval they assumed the products would also be added to the substitution list. Therefore it is important for the MPA to communicate if there are any problems, as this could affect the company's market prospects.

...examples

The FGL refers to two examples from a previous letter to the MPA: Nycomed's anti-epileptic, Gabapentin Nycomed (gabapentin), was not considered substitutable for Pfizer's Neurontin (gabapentin) for epilepsy. The agency said the product had a narrow therapeutic window and so it could not rule out the possibility that switching a patient from the original product to a generic could cause problems. The possibility that the prescriber might identify such risks in advance was limited.

Another was GEA's Fluconazol GEA (fluconazole), which was approved under the European mutual recognition procedure. The MPA decided not to list the product, saying differences in its labelling meant it was not substitutable for the originator, Pfizer's Diflucan. The general manager of GEA in Sweden, Hakan Josephsson, told *Script* that the labelling had now been changed and the product would be added to the substitution list. But if the MPA had told the company about this problem earlier on, it could have been resolved more quickly, he said.

The FGL says that in both cases it would have been better if the MPA had contacted the companies to inform them about the reasons for its decisions and to find a solution. The consequence of a restrictive substitution approach is less competition and therefore fewer saving opportunities for taxpayers, according to the association. "For the companies that market generics it means insecurity and the risk that investments will not yield economic returns," it says.

...agency reply

The agency said it would reply in writing or invite the FGL to a meeting to discuss the issue. It said the substitution regulation and the agency's overall criteria for the list had been published in 2002; the law said that only products that were medically equivalent should be added to the list. The agency had then developed its criteria for the listing

EMA looks at early detection of hepatotoxicity

The European Medicines Agency (EMA) is preparing guidance for the pharmaceutical industry on ways of detecting a product's hepatotoxicity potential before it enters clinical trials.

Liver injury is one of the most common reasons why approved drugs are withdrawn from the market, and over the past few years several products have been withdrawn or discussed by the agency's scientific advisory committee, the CHMP, for this reason, the EMA says. The CHMP's pharmacovigilance working party has discussed more than 20 products because of signs of liver damage.

None of the current guidelines looks at how to detect and collect early signals linked to drug-induced liver injury in non-clinical studies, and experience shows that using traditional reporting strategies may be insufficient to predict the outcome of serious adverse liver effects in humans, the agency notes.

It has therefore issued a concept paper as a first step towards developing a CHMP guideline on early detection of hepatotoxicity from non-clinical documentation. This will help industry and regulatory assessors to evaluate and interpret non-clinical data that could possibly serve as prognostic early signals. The draft guideline is expected to be discussed at the December meeting of the CHMP's safety working party.

■ Medicine spending up by 6.5% in Norway

Medicine spending in Norway grew by 6.5% to Nkr4.8 billion (\$700 million) during the first six months of this year compared with the same period last year, according to Farmastat. The generics sector saw the strongest growth rate, with sales up by 8.8% to Nkr596 million. Sales of parallel imports fell by 6% to Nkr283 million. Sales of non-prescription products through pharmacies also declined, by 0.9% to Nkr365 million, partly as a result of the liberalisation of the OTC market in Norway last year. Sales of medicines had slowed down in 2003, when the growth rate was only 3.3% compared with double digit growth rates in previous years (*Script* No 2948, p 8).

■ UK sales of athlete's foot products could grow by 16% this year

The switching of products to general sales list (GSL) status in the UK can have beneficial effects on pharmacy sales, according to Novartis Consumer Health. The switch of its Lamisil (terbinafine) 1% spray to GSL from August '03 combined with the switch of Lamisil 1% cream to GSL in March, is expected to contribute to an estimated 16% growth in the market for athlete's foot products this year, the company says. 70% of such sales are of GSL products, and 66% of GSL sales are in pharmacies, so pharmacies should benefit from the switch. The total UK market for athlete's foot products is estimated at £20.3 million.

■ EU pays more into Global Fund

The European Commission is to pay an additional €42 million to the Global Fund to fight HIV/AIDS, TB and Malaria, bringing its total contribution since 2002 to €375 million, according to a statement by the Fund for 2002-2006.

Serial No. 10/813,760

Exhibit E

or alterations of fluid and electrolyte balance hepatic coma.

Triamterene has been reported in renal action with other calculus components. It should be used with caution in patients with history of renal disease.

Triamterene is a weak folic acid antagonist. It may contribute to the appearance of megaloblastic anemia when folic acid stores are depleted.

Periodic blood evaluations are recommended.

Hypokalemia may occur or acute gouty arthritis in certain patients receiving thiazide therapy.

Adverse Effects—The thiazides may decrease levels without signs of thyroid disturbance.

It is decreased by thiazides. Pathological thyroid gland with hypercalcemia and has been observed in a few patients on therapy. The common complications of such as renal lithiasis, bone resorption have not been seen. Thiazides used before carrying out tests for parathyroid hormone levels may be increased.

Diabetes mellitus which has been manifested during thiazide administration. Sensitivity reactions to thiazides may occur with or without a history of allergy or bronchospasm.

On or activation of systemic lupus erythematosus has been reported.

Thiazides may add to or potentiate the hypotensive drug.

Decrease arterial responsiveness to norepinephrine is not sufficient to preclude their use for therapeutic use. Thiazides may increase responsiveness to tubocurarine.

Should not be given with diuretics because of clearance and add a high risk of lithium package insert on lithium before use of therapy.

has been reported in a few patients in and formulations containing triamterene. Caution is therefore advised in patients receiving triamterene. Agents should be monitored frequently.

Interactions—Triamterene and quinolones spectra; thus MAXIZIDE may be measured of quinidine.

C—The use of MAXIZIDE in pregnancy is not established. Animal reproduction studies have shown that MAXIZIDE is also not

to cause fetal harm when administered to a pregnant woman.

It is not known if it can affect reproductive capacity in pregnant women.

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Hypersensitivity: anaphylaxis, purpura, photosensitivity, rash, urticaria, necrotizing angitis (including cutaneous vasculitis), fever, respiratory distress including pneumonia. Other: hyperglycemia, glycosuria, hyperuricemia, restlessness, transient blurred vision.

Triamterene
Hypersensitivity: anaphylaxis, photosensitivity and rash. Other: Triamterene has been reported in renal stones in association with other calculus materials. Triamterene has been associated with blood dyscrasias.

Whenever adverse reactions are moderate to severe, therapy should be discontinued or withdrawn.

OVERDOSEAGE
No specific data are available regarding MAXIZIDE triamterene/hydrochlorothiazide overdose in humans and no specific antidote is available.

Fluid and electrolyte imbalances are the most important concern. Excessive doses of the triamterene component may elicit hyperkalemia, dehydration, nausea, vomiting and weakness and possibly hypotension. Overdosing with hydrochlorothiazide has been associated with hypokalemia, hypochloremia, hyponatremia, dehydration, lethargy (may progress to coma) and gastrointestinal irritation. Treatment is symptomatic and supportive. Therapy with MAXIZIDE should be discontinued. Induce emesis or institute gastric lavage. Monitor serum electrolyte levels and fluid balance. Institute supportive measures as required to maintain hydration, electrolyte balance, respiratory, cardiovascular and renal function.

DOSAGE AND ADMINISTRATION
The usual dose of MAXIZIDE-25 MG is one or two tablets daily, given as a single dose, with appropriate monitoring of serum potassium (see WARNINGS). The usual dose of MAXIZIDE is one tablet daily, with appropriate monitoring of serum potassium (see WARNINGS). There is no experience with the administration of more than two MAXIZIDE-25 MG tablets daily or more than two MAXIZIDE-25 MG tablets daily.

Patients receiving 50 mg of hydrochlorothiazide who become hypokalemic may be transferred to MAXIZIDE directly. Patients receiving 25 mg hydrochlorothiazide who become hypokalemic may be transferred to MAXIZIDE 37.5 mg triamterene/25 mg hydrochlorothiazide directly.

In patients requiring hydrochlorothiazide therapy and in whom hypokalemia cannot be risked, therapy may be initiated with MAXIZIDE-25 MG. If an optimal blood pressure response is not obtained with MAXIZIDE-25 MG, the dose should be increased to two MAXIZIDE-25 MG tablets daily as a single dose, or one MAXIZIDE tablet daily. If blood pressure still is not controlled, another antihypertensive agent may be added (see PRECAUTIONS, Drug Interactions).

Clinical studies have shown that patients taking less bioavailable formulations of triamterene and hydrochlorothiazide (totaling 75-100 mg hydrochlorothiazide and 150-200 mg triamterene) may be safely changed to one MAXIZIDE tablet per day. Patients receiving less bioavailable formulations of triamterene and hydrochlorothiazide in daily doses of 25-50 mg hydrochlorothiazide and 50-100 mg triamterene may be safely changed to one MAXIZIDE-25 MG tablet daily.

Patients receiving less bioavailable formulations of triamterene and hydrochlorothiazide should be monitored clinically and for serum potassium after the transfer.

HOW SUPPLIED
MAXIZIDE tablets are bowtie-shaped, flat-faced beveled, light yellow tablets, engraved with MAXIZIDE on one side and score on the other with LL on the left and M8 on the right of the score. Each tablet contains 75 mg of triamterene, USP and 50 mg of hydrochlorothiazide, USP. They are supplied as follows:

NDC 0005-4460-43—Bottle of 100 with CRC
NDC 0005-4460-31—Bottle of 500
NDC 0005-4460-40—Unit Dose 10 x 10s

MAXIZIDE-25 MG tablets are bowtie-shaped, flat-faced beveled, light green tablets, engraved with MAXIZIDE on one side and score on the other with LL on the left and M9 on the right of the score. Each tablet contains 37.5 mg of triamterene, USP and 25 mg hydrochlorothiazide, USP.

They are supplied as follows:

NDC 0005-4464-43—Bottle of 100 with CRC
NDC 0005-4464-40—Unit Dose 10 x 10s

Store at Controlled Room Temperature 15-30°C (59-86°F). Protect From Light.

Dispense in a tight, light-resistant, child-resistant container. MILITARY AND VA PREPARED BY: MAXIZIDE Triamterene 75 mg/Hydrochlorothiazide 50 mg

Manufactured for
LEDELER LABORATORIES DIVISION
American Cyanamid Company, Pearl River, NY 10965
by
MYLAN PHARMACEUTICALS, INC.
Morgantown, West Virginia 26505
Shown in Product Identification Section, page 414

METHOTREXATE Tablets
METHOTREXATE Sodium
METHOTREXATE LPF Sodium Parenteral

WARNINGS

METHOTREXATE SHOULD BE USED ONLY BY PHYSICIANS WHOSE KNOWLEDGE AND EXPERIENCE INCLUDES THE USE OF ANTIMETABOLITE THERAPY.

THE USE OF METHOTREXATE HIGH-DOSE REGIMENS RECOMMENDED FOR OSTEOSARCOMA REQUIRES METICULOUS CARE OF DOSE AND ADMINISTRATION. HIGH-DOSE REGIMENS FOR OTHER NEOPLASTIC DISEASES ARE INVESTIGATIONAL AND A THERAPEUTIC ADVANTAGE HAS NOT BEEN ESTABLISHED.

BECAUSE OF THE POSSIBILITY OF SERIOUS TOXIC REACTIONS, THE PATIENT SHOULD BE INFORMED BY THE PHYSICIAN OF THE RISKS INVOLVED AND SHOULD BE UNDER A PHYSICIAN'S CONSTANT SUPERVISION.

DEATHS HAVE BEEN REPORTED WITH THE USE OF METHOTREXATE IN THE TREATMENT OF MALIGNANCY AND PSORIASIS.

IN THE TREATMENT OF PSORIASIS, METHOTREXATE USE SHOULD BE RESTRICTED TO PATIENTS WITH SEVERE RECALCITRANT, DISABLING DISEASE, WHICH IS NOT ADEQUATELY RESPONSIVE TO OTHER FORMS OF THERAPY, AND ONLY WHEN THE DIAGNOSIS HAS BEEN ESTABLISHED AND AFTER APPROPRIATE CONSULTATION.

1. Methotrexate has been reported to cause fetal death and/or congenital anomalies. Therefore, it is not recommended for women of childbearing potential unless there is clear medical evidence that the benefits can be expected to outweigh the considered risks.

2. A mandatory part of methotrexate therapy is periodic monitoring for toxicity, including CBC with differential and platelet counts, and liver and renal function tests. Periodic liver biopsies may be indicated in some situations. Patients at increased risk for higher blood levels of methotrexate should be monitored more frequently. (See PRECAUTIONS.)

3. Methotrexate can be hepatotoxic. Transient elevations of liver enzymes are seen frequently. Liver biopsies have shown fatty change and perialveolar inflammation, and fibrosis and cirrhosis have been reported. These lesions may occur in the absence of symptoms or previous liver function test abnormalities. (See PRECAUTIONS.)

4. Methotrexate-induced lung disease is a potentially dangerous lesion, which may occur acutely at any time during therapy; it is not always fully reversible. Pulmonary symptoms (especially a dry, nonproductive cough) require interruption of treatment and careful investigation.

5. Methotrexate may produce marked bone marrow depression, with resultant anemia, leukopenia, and/or thrombocytopenia.

6. Diarrhea and ulcerative stomatitis require interruption of therapy, otherwise, hemorrhagic enteritis and death from intestinal perforation may occur.

7. Methotrexate therapy in patients with abnormal renal function should be undertaken, if at all, with extreme caution, and at reduced doses, because renal impairment will elevate methotrexate blood levels.

8. Deaths have been reported with concomitant administration of methotrexate usually in high dosage along with some nonsteroidal anti-inflammatory drugs (NSAIDs). (See PRECAUTIONS.)

Continued on next page

Information on Lederle products listed on these pages is the full prescribing information from product literature or package inserts effective in August, 1988. Information concerning all Lederle products may be obtained from the Professional Services Department, Lederle Laboratories, Pearl River, New York, 10965.

Information will be superseded by supplements and subsequent editions

Calcijel—Cont.

1. Treatment of Hypercalcemia and Overdose in Patients on Hemodialysis

General treatment of hypercalcemia (greater than 1 mg/dl, above the upper limit of normal range) consists of immediate discontinuation of Calcijel® therapy, institution of a low calcium diet and withdrawal of calcium supplements. Serum calcium levels should be determined daily until normocalcemia ensues. Hypercalcemia usually resolves in two to seven days. When serum calcium levels have returned to within normal limits, Calcijel® therapy may be reinstituted at a dose 0.5 mcg less than prior therapy. Serum calcium levels should be obtained at least twice weekly after all dosage changes.

2. Treatment of Accidental Overdose of Calcijel Injection

The treatment of acute accidental overdose of Calcijel® should consist of general supportive measures. Serial serum electrolyte determinations (especially calcium), rate of urinary calcium excretion and assessment of electrocardiographic abnormalities due to hypercalcemia should be obtained. Such monitoring is critical in patients receiving dialysis. Discontinuation of supplemental calcium and low calcium diet are also indicated in accidental overdose. Due to the relatively short duration of the pharmacological action of calcitriol, further measures are probably unnecessary. Should, however, persist and markedly elevated serum calcium levels occur, there are a variety of therapeutic alternatives which may be considered, depending on the patient's underlying condition. These include the use of drugs such as phosphates and corticosteroids as well as measures to induce an appropriate forced diuresis. The use of peritoneal dialysis against a calcium-free dialysate has also been reported.

DOSAGE AND ADMINISTRATION

The optimal dose of Calcijel® (calcitriol injection) must be carefully determined for each patient.

The effectiveness of Calcijel® therapy is predicated on the assumption that each patient is receiving an adequate and appropriate daily intake of calcium. The RDA for calcium is 800 mg. To ensure that each patient receives an adequate daily intake of calcium, the physician should either prescribe a calcium supplement or instruct the patient in proper dietary measures.

The recommended initial dose of Calcijel®, depending on the severity of the hypocalcemia and/or secondary hyperparathyroidism, is 1.0 mg (0.02 mcg) to 2 mcg administered three times weekly, approximately every other day. Doses as small as 0.5 mcg and as large as 4 mcg three times weekly have been used as an initial dose. If a satisfactory response is not observed, the dose may be increased by 0.5 to 1 mcg at two to four week intervals. During the titration period, serum calcium and phosphorus levels should be obtained at least twice weekly. If hypercalcemia or a serum calcium times phosphate product greater than 70 is noted, the drug should be immediately discontinued until these parameters are appropriate. Then, the Calcijel® dose should be reinstituted at a lower dose. Doses may need to be reduced as the PTH levels decrease in response to the therapy. Thus, incremental dosing must be individualized and commensurate with PTH, serum calcium and phosphorus levels. The following is a suggested approach in dose titration:

PTH Levels	Calcijel® Dose
the same or increasing	increase
decreasing by <30%	increase
decreasing by >30%, < 60%	maintain
decreasing by > 60%	decrease
one and one-half to three times the upper limit of normal	maintain

Parenteral drug products should be inspected visually for particulate matter and discoloration prior to administration, whenever solution and container permit.

Discard unused portion.

HOW SUPPLIED

Calcijel® (calcitriol injection) is supplied as follows:

List	Container	Concentration	FN
8110	Ampul	1 mcg/mL	1 mL

Protect from light.

Store at controlled room temperature 15° to 30°C (59° to 86°F).

Patent Pending.

Ref. EN-0249 Rev. September, 2004

Médlia:
Hoeprin, Inc., Lake Forest, IL 60045 USA
For Abbott Laboratories, North Chicago, IL 60064 USA

DEPAKOTE® ER
(divalproex sodium)
extended-release tablets

BOX WARNING

HEPATOOTOXICITY
HEPATIC FAILURE RESULTING IN FATALITIES HAS OCCURRED IN PATIENTS RECEIVING VALPROIC ACID AND ITS DERIVATIVES. EXPERIENCE HAS INDICATED THAT CHILDREN UNDER THE AGE OF TWO YEARS ARE AT A CONSIDERABLY INCREASED RISK OF DEVELOPING FATAL HEPATOOTOXICITY, ESPECIALLY THOSE ON MULTIPLE ANTI-CONVULSANTS. THOSE WITH CONGENITAL METABOLIC DISORDERS, THOSE WITH SEVERE SEIZURE DISORDERS ACCOMPANIED BY MENTAL RETARDATION, AND THOSE WITH ORGANIC BRAIN DISEASE. WHEN DEPAKOTE IS USED IN THIS PATIENT GROUP, IT SHOULD BE USED WITH EXTREME CAUTION AND AS A SOLE AGENT THE BENEFITS OF THERAPY SHOULD BE WEIGHED AGAINST THE RISKS ABOVE THIS AGE GROUP. EXPERIENCE IN EPILEPSY HAS INDICATED THAT THE INCIDENCE OF FATAL HEPATOOTOXICITY DECREASES CONSIDERABLY IN PROGRESSIVELY OLDER PATIENT GROUPS. THESE INCIDENTS USUALLY HAVE OCCURRED DURING THE FIRST SIX MONTHS OF TREATMENT. SERIOUS OR FATAL HEPATOOTOXICITY MAY BE PRECEDED BY NON-SPECIFIC SYMPTOMS SUCH AS MALAISE, WEAKNESS, LETARGY, FACIAL EDEMA, ANOREXIA, AND VOMITING. IN PATIENTS WITH EPILEPSY, A LOSS OF SEIZURE CONTROL MAY ALSO OCCUR. PATIENTS SHOULD BE MONITORED CLOSELY FOR APPEARANCE OF THESE SYMPTOMS. LIVER FUNCTION TESTS SHOULD BE PERFORMED PRIOR TO TREATMENT AND FREQUENT INTERVALS THEREAFTER, ESPECIALLY DURING THE FIRST SIX MONTHS.

TERATOGENICITY

VALPROATE CAN PRODUCE TERATOGENIC EFFECTS SUCH AS NEURAL TUBE DEFECTS (E.G., SPINA BIFIDA). ACCORDINGLY, THE USE OF DEPAKOTE TABLETS IN WOMEN OF CHILD-BEARING POTENTIAL REQUIRES THAT THE BENEFITS OF ITS USE BE WEIGHED AGAINST THE RISK OF INJURY TO THE FETUS. THIS IS ESPECIALLY IMPORTANT WHEN THE TREATMENT OF A SPONTANEOUSLY REVERSIBLE CONDITION NOT ORDINARILY ASSOCIATED WITH PERMANENT INJURY OR RISK OF DEATH (E.G., MIGRAINE) IS CONTEMPLATED. SEE WARNINGS, INFORMATION FOR PATIENTS.

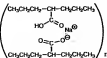
AN INFORMATION SHEET DESCRIBING THE TERATOGENIC POTENTIAL OF VALPROATE IS AVAILABLE FOR PATIENTS.

PANCREATITIS

CASES OF LIFE-THREATENING PANCREATITIS HAVE BEEN REPORTED IN BOTH CHILDREN AND ADULTS RECEIVING VALPROATE. SOME OF THE CASES HAVE BEEN DESCRIBED AS HEMORRHAGIC WITH A RAPID PROGRESSION FROM INITIAL SYMPTOMS TO DEATH. CASES HAVE BEEN REPORTED SHORTLY AFTER INITIAL USE AS WELL AS AFTER SEVERAL YEARS OF USE. PATIENTS AND GUARDIANS SHOULD BE WARNED THAT ABDOMINAL PAIN, NAUSEA, VOMITING, AND/OR ANOREXIA CAN BE SYMPTOMS OF PANCREATITIS THAT REQUIRES IMMEDIATE MEDICAL EVALUATION. IF PANCREATITIS IS DIAGNOSED, VALPROATE SHOULD ORDINARILY BE DISCONTINUED. ALTERNATIVE TREATMENT FOR THE UNDERLYING MEDICAL CONDITION SHOULD BE INITIATED AS CLINICALLY INDICATED. (See WARNINGS AND PRECAUTIONS.)

DESCRIPTION

Divalproex sodium is a stable co-formulation compound consisting of sodium valproate and valproic acid in a molar relationship and formed during the partial neutralization of valproic acid with 0.5 equivalent of sodium hydroxide. Chemically it is designated as sodium hydrogen bis(2-propylpentanoate). Divalproex sodium has the following structure:



Divalproex sodium occurs as a white powder with a characteristic odor.

DEPAKOTE ER 250 and 500 mg tablets are for oral administration. DEPAKOTE ER 500 mg tablets contain divalproex sodium in a once-a-day extended-release formulation equivalent to 250 and 500 mg of valproic acid.

In addition, 500 mg tablets contain iron glycol and polysorbate.

DEPAKOTE ER 250 and 500 mg tablets: FDAC Blue No. 1, yellowellene, lactose, microcrystalline cellulose, polyethylene glycol, croscarmellose sodium, silicon dioxide, titanium dioxide, and triacetin.

In addition, 500 mg tablets contain iron glycol and polysorbate.

CLINICAL PHARMACOLOGY

Pharmacodynamics

Divalproex sodium dissociates to the valproate ion in the plasma. The valproate ion is the active moiety. Valproic acid exerts its therapeutic effects have not been established. It has been suggested that its activity in epilepsy is related to its plasma concentrations of gamma-aminobutyric acid (GABA).

Pharmacokinetics

Absorbability

The absolute bioavailability of DEPAKOTE ER tablets administered as a single dose after a meal was approximately 80% relative to intravenous injection.

When given in equal total daily doses, the bioavailability of DEPAKOTE ER is less than that of DEPAKOTE (divalproex sodium) extended-release tablets. In five multiple-dose studies in healthy subjects (N=82) and in subjects with epilepsy (N=86), when administered under fasting and nonfasting conditions, DEPAKOTE ER given once daily produced an average bioavailability of 80% relative to an equal total daily dose of DEPAKOTE given BID, TID, or QID. The median time to maximum plasma valproate concentrations (C_{max}) after DEPAKOTE ER administration ranged from 4 to 17 hours. After multiple once-daily dosing of DEPAKOTE ER, the peak-to-trough fluctuation in plasma valproate concentrations was 10-20% lower than that of regular DEPAKOTE given BID, TID, or QID.

Conversion

When DEPAKOTE ER is given in doses 8 to 20% higher than the total daily dose of DEPAKOTE, the two formulations are bioequivalent. In two randomized, crossover studies, multiple daily doses of DEPAKOTE were compared to 8 to 20% higher once-daily doses of DEPAKOTE ER. In these studies, the plasma valproate concentrations of DEPAKOTE were equivalent with respect to area under the curve (AUC), a measure of the extent of bioavailability. Additionally, valproate plasma concentrations were not significantly different for DEPAKOTE ER relative to DEPAKOTE regimens (see following table).

Concomitant Antiepileptic Drugs

Concomitant antiepileptic drugs (topiramate, phenobarbital, carbamazepine, phenytoin, and lamotrigine) were evaluated which induce the cytochrome P450 isozyme system did not significantly alter valproate bioavailability when converting between DEPAKOTE and DEPAKOTE ER.

Distribution

Protein Binding

The plasma protein binding of valproate is concentration dependent and the free fraction increases from approximately 10% at 40 µg/mL to 18.6% at 130 µg/mL. Protein binding of valproate is reduced in the elderly in patients with chronic hepatic diseases, in patients with renal impairment, and in the presence of other drugs (e.g., aspirin). Conversely, valproate may displace certain protein-bound drugs (e.g., phenytoin, carbamazepine, warfarin, and salicylic acid) (see PRECAUTIONS). Drug interactions for more detailed information on the pharmacokinetic interactions of valproate with other drugs.

CNS Distribution

Valproate concentrations in cerebrospinal fluid (CSF) approximate unbound concentrations in plasma (about 10% of total concentration).

Metabolism

Valproate is metabolized almost entirely by the liver. In adult patients on monotherapy, 30-50% of an administered dose appears in urine as a glucuronide conjugate. Mitochondrial β -oxidation is the major metabolic pathway, typically accounting for over 40% of the dose. Usually, less than 10-20% of the dose is eliminated by other oxidative mechanisms. Less than 3% of an administered dose is excreted unchanged in urine.

The relationship between dose and total valproate concentration is nonlinear; concentration does not increase proportionally with the dose, but rather, increases to a lesser extent due to saturable plasma protein binding. The kinetics of unbound drug are linear.

Elimination

Mean plasma clearance and volume of distribution for total valproate are 0.56 L/hr/L⁷³ m³ and 1.1 L/L⁷³ m³, respectively. Mean plasma clearance and volume of distribution for free valproate are 4.6 L/hr/L⁷³ m³ and 9.2 L/L⁷³ m³. Mean terminal half-life for valproate monotherapy ranged from 8 to 15 hours following oral dosing regimens of 250 to 1000 mg.

The estimates cited apply primarily to patients who are not taking drugs that affect hepatic metabolism or excretion. For example, patients taking enzyme-inducing antiepileptic drugs (carbamazepine, phenytoin, and phenobarbital).

Zempler Injection—Cont.

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 2. IDQOQ 2003.
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 4. Revised: September, 2008.
 5. Manufactured by Hospira, Inc.
 6. Lake Forest, IL 60045 USA
 7. For Abbott Laboratories
 8. North Chicago, IL 60064, U.S.A.
 9. Information on the Abbott pharmaceutical products listed on these pages is from the prescribing information in use as of June 1, 2007. For more information, please visit abbott.com or call 1-800-633-9110.

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 1-800-354-5646
 (follow the prompts)

TRACLEER® (ir) **3**
 bosentan tablets
 62.5 mg and 125 mg film-coated tablets

Use of TRACLEER® requires attention to two significant concerns: 1) potential for serious liver injury, and 2) potential damage to a fetus.

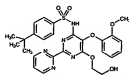
WARNING: Potential liver injury.
 TRACLEER® causes at least 3-fold upper limit of normal (ULN) elevation of liver aminotransferases (ALT and AST) in about 11% of patients, accompanied by elevated bilirubin in a small number of cases. Because these changes are a marker for potential serious liver injury, serum aminotransferase levels must be measured prior to initiation of treatment and then monthly during treatment. Potential liver injury and DOSAGE AND ADMINISTRATION. In the post-marketing surveillance, in the setting of close monitoring, rare cases of unexplained hepatic cirrhosis were reported after prolonged (> 12 months) therapy with TRACLEER® in patients with multiple co-morbidities and drug therapies. There have also been rare reports of liver failure. The contribution of TRACLEER® in these cases could not be excluded.
 In at least one case the initial presentation (after > 20 months of treatment) included pronounced elevations in aminotransferases and bilirubin levels accompanied by non-specific symptoms, all of which resolved slowly over time after discontinuation of TRACLEER®. This case reinforces the importance of strict adherence to the monthly monitoring schedule for the duration of treatment and the treatment algorithm, which includes stopping TRACLEER® if aminotransferase elevations are accompanied by signs or symptoms of liver dysfunction (see DOSAGE AND ADMINISTRATION).
 Elevations in aminotransferases require close attention (see DOSAGE AND ADMINISTRATION).

TRACLEER® should generally be avoided in patients with elevated aminotransferases (> 3 x ULN at baseline), because monitoring liver injury may be more difficult. If liver aminotransferase elevations are accompanied by clinical symptoms of liver injury (such as nausea, vomiting, fatigue, abdominal pain, jaundice, or darkening of urine), TRACLEER® should be stopped. There is no experience with the re-introduction of TRACLEER® in these circumstances.

CONTRAINDICATION: Pregnancy.
 TRACLEER® (bosentan) is very likely to produce major birth defects if used by pregnant women, as this effect has been seen consistently when it is administered to animals (see CONTRAINDICATIONS). Therefore, pregnancy must be excluded before the start of treatment with TRACLEER® and prevented thereafter by the use of a reliable method of contraception. Hormonal contraceptives, including oral, injectable, transdermal, and implantable contraceptives should not be used as the sole means of contraception because they may not be effective in patients receiving TRACLEER® (see Precautions/Drug Interactions). Therefore, effective contraception through additional forms of contraception must be practiced. Monthly pregnancy tests should be obtained.
 Because of potential liver injury and in an effort to make the chance of fetal exposure to TRACLEER® (bosentan) as small as possible, TRACLEER® may be prescribed only through the TRACLEER Access Program by calling 1-866-228-3546. Adverse events can also be reported directly via this number.

DESCRIPTION

Bosentan is the first of a new drug class, an endothelin receptor antagonist.
 TRACLEER® (bosentan) belongs to a class of highly substituted pyrimidine derivatives, with no chiral centers. It is designated chemically as 4-tert-butyl-N-[4-hydroxy-2-methoxy-5-(2-methoxyphenyl)-2H-1,2,4-triazol-3-yl]benzenesulfonamide monohydrate and has the following structural formula:



Bosentan has a molecular weight of 505.61 and a molecular formula of $C_{24}H_{27}N_5O_5S_2$. Bosentan is a white to yellowish solid. It is poorly soluble in water (1.0 mg/100 mL) and in aqueous solutions at low pH (0.1 mg/100 mL) at pH 1.1 and 4.0, 0.2 mg/100 mL at pH 5.0. Solubility increases at higher pH values (4.3 mg/100 mL at pH 7.5). In the solid state, bosentan is very stable, is not hygroscopic and is not light sensitive.
 TRACLEER® is available as 62.5 mg and 125 mg film-coated tablets for oral administration, and contains the following excipients: corn starch, pregelatinized starch, sodium starch glycolate, polydioxane, glyceryl behenate, magnesium stearate, hydroxypropylmethylcellulose, triacetin, titanium dioxide, iron oxide yellow, iron oxide red, and ethylcellulose. Each TRACLEER® 62.5 mg tablet contains 64.54 mg of bosentan, equivalent to 62.5 mg of anhydrous bosentan. Each TRACLEER® 125 mg tablet contains 129.08 mg of bosentan, equivalent to 125 mg of anhydrous bosentan.

CLINICAL PHARMACOLOGY

Mechanism of Action.
 Endothelin-1 (ET-1) is a neurohormone, the effects of which are mediated by binding to ET_A and ET_B receptors in the endothelium and various smooth muscle cells. ET_A antagonists are elevated in plasma end lung tissue of patients with pulmonary arterial hypertension, suggesting a pathogenic role for ET_A in this disease. Bosentan is a specific and

competitive antagonist at endothelin receptor types ET_A and ET_B. Bosentan has a slightly higher affinity for ET_A receptors than for ET_B receptors.

Pharmacokinetics

After oral administration, maximum plasma concentrations of bosentan are attained within 5-6 hours and the terminal elimination half-life (t_{1/2}) is about 5 hours in healthy adult subjects. The exposure to bosentan after intravenous and oral administration is about 2-fold greater in adult patients with pulmonary arterial hypertension than in healthy adult subjects.

Absorption and Distribution

The absolute bioavailability of bosentan in normal volunteers is about 50% and is unaffected by food. The volume of distribution is about 18 L. Bosentan is highly bound (> 98%) to plasma proteins, mainly albumin. Bosentan does not penetrate into erythrocytes.

Metabolism and Elimination

Bosentan has three metabolites, one of which is pharmacologically active and may contribute 10%-20% of the effect of bosentan. Bosentan is an inducer of CYP2C9 and CYP2C19 and possibly also of CYP2C17. Total clearance after a single intravenous dose is about 4 L/hr in patients with pulmonary arterial hypertension. In some multiple-dose studies, plasma concentrations in healthy adults decrease gradually to 50-65% of those seen after single dose administration, probably the effect of auto-inhibition of the metabolizing liver enzymes. Steady-state is reached within 3-4 days. Bosentan is eliminated by biliary excretion following metabolism in the liver. Less than 3% of an administered oral dose is recovered in urine.

Special Populations

It is not known whether bosentan's pharmacokinetics is influenced by gender, body weight, race, or age.

Liver Function Impairment

In vitro and in vivo evidence showing extensive hepatic metabolism of bosentan suggests that liver impairment could significantly increase exposure of bosentan. In a study comparing 8 patients with mild liver impairment (as indicated by the Child-Pugh method) to 8 controls, the single- and multiple-dose pharmacokinetics of bosentan were not altered in patients with mild hepatic impairment. The influence of moderate or severe liver impairment on the pharmacokinetics of bosentan has not been evaluated. Bosentan should generally be avoided in patients with moderate or severe liver abnormalities unless elevated aminotransferases > 3 x ULN (see DOSAGE AND ADMINISTRATION AND WARNINGS).

Renal Impairment

In patients with severe renal impairment (creatinine clearance 15-30 mL/min), plasma concentrations of bosentan were essentially unchanged and plasma concentrations of the three active metabolites were also unchanged compared to people with normal renal function. These differences do not appear to be clinically important (see DOSAGE AND ADMINISTRATION).

Clinical Studies

Pulmonary Arterial Hypertension

Two randomized, double-blind, multi-center, placebo-controlled trials were conducted in 32 and 213 patients. The larger study (BREATHE-1) compared 2 doses (125 mg b.i.d. and 250 mg b.i.d.) of TRACLEER® with placebo. The smaller study (Study 351) compared 125 mg b.i.d. with placebo. Patients had severe (WHO functional Class III-IV) pulmonary arterial hypertension: primary pulmonary hypertension (72%) or pulmonary hypertension secondary to scleroderma or other connective tissue diseases (21%), or to autoimmune diseases (7%). There were no patients with pulmonary hypertension secondary to other conditions and no HIV disease, or recurrent pulmonary emboli.

In both studies, TRACLEER® or placebo was added to patients' current therapy, which could have included a combination of diuretics, anticoagulants, diuretics, and vasodilators. The primary endpoint was the proportion of patients who were hospitalized for pulmonary hypertension or died. For the 125 mg b.i.d. for 4 weeks and then at 125 mg b.i.d. or 250 mg b.i.d. for either 12 (BREATHE-1) or 6 (Study 351) additional weeks. The primary study endpoint was 6-minute walk distance. In addition, symptoms and functional status were assessed. Hemodynamic measurements were made at 12 weeks in Study 351.

The mean age was about 63 years. About 80% of patients were female, and about 20% were male. Patients had been diagnosed with pulmonary hypertension for a mean of 2.4 years.

Submaximal Exercise Capacity

Results of the 6-minute walk distance at 3 months (Study 351) and 6 months (BREATHE-1) are shown in Table 1.

See table 1 below

In both trials, treatment with TRACLEER® resulted in a significant increase in exercise capacity. The improvement in walk distance was apparent at 2 months. Patients treated with 125 mg b.i.d. and fully developed by about 2 months of treatment (Figure 1). It was maintained for up to 7 months of double-blind treatment. Patients treated with 250 mg b.i.d. and fully developed by about 2 months of treatment (Figure 1). It was maintained for up to 7 months of double-blind treatment. Patients treated with 250 mg b.i.d. but the potential for increased liver injury causes this does not to be recommended (see DOSAGE AND ADMINISTRATION). There were no apparent differences in treatment effects on walk distance among subgroups analyzed by demographic fac-

tors, baseline studies had

Figure 1



Figure 2



Figure 3



Figure 4



Figure 5



Figure 6



Figure 7



Figure 8



Figure 9



Figure 10



Figure 11



Table 1. Effects of bosentan on 6-minute walk distance

	BREATHE-1			Study 351		
	Bosentan 125 mg b.i.d. (n = 74)	Bosentan 250 mg b.i.d. (n = 70)	Placebo (n = 69)	Bosentan 125 mg b.i.d. (n = 23)	Placebo (n = 11)	
Baseline	328 ± 73	333 ± 75	344 ± 76	360 ± 86	355 ± 82	
End point	353 ± 115	379 ± 101	336 ± 129	431 ± 66	350 ± 147	
Change from baseline	27 ± 75	46 ± 62	-8 ± 96	70 ± 56	-6 ± 121	
Placebo - subtracted	35 [†]	54 [†]		76 [†]		

Distance in meters; mean ± standard deviation. Changes are in week 16 for BREATHE-1 and in week 12 for Study 351.

* p = 0.01; by Wilcoxon

† p = 0.0001 for 250 mg; by Wilcoxon

‡ p = 0.02; by Student's t-test.

Information will be superseded by supplements and subsequent editions

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4	0469-0003
1	0469-0020
4	0469-0021

h 0.6 mL of the 10 mL

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ity" over "active" T cells
in diseased human skin.
J. Invest. Dermatol. 1990;
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1990; 95:255-259.

See figure at top of next column
The empirical molecular formula is $C_{21}H_{24}N_2O_5$ and the formula weight is 1222.28.
Micanfungin sodium is a light-sensitive, hygroscopic white powder that is freely soluble in water, isotonic sodium chloride solution, *N,N*-dimethylformamide and dimethylsulfoxide, slightly soluble in methyl alcohol, and practically insoluble in acetone, ethyl alcohol (95%), acetone, diethyl ether and *n*-hexane.

CLINICAL PHARMACOLOGY
Pharmacokinetics
The pharmacokinetics of micanfungin were determined in healthy subjects, hematopoietic stem cell transplant recipients, and patients with esophageal candidiasis up to a maximum daily dose of 8 mg/kg body weight.
The relationship of area under the concentration-time curve (AUC) to micanfungin dose was linear over the daily dose range of 50 mg to 150 mg and 3 mg/kg to 8 mg/kg body weight.

Steady-state pharmacokinetic parameters in relevant patient populations after repeated daily administration are presented in the table below.
See table 1 above.
Distribution
The mean \pm standard deviation volume of distribution of micanfungin at terminal phase was 0.39 ± 0.11 L/kg body weight when determined in adult patients with esophageal candidiasis at the dose range of 50 mg to 150 mg.
Micanfungin is highly (95-98%) protein bound in vitro, independent of plasma concentrations over the range of 10 to 100 mg/mL. The primary binding protein is albumin; however, micanfungin, at therapeutically relevant concentrations, does not completely displace bilirubin binding to albumin. Micanfungin also binds to a lesser extent to α_2 -acid glycoprotein.

Metabolism
Micanfungin is metabolized to M-1 (testosterone form) by acyltransferase, with further metabolism to M-2 (methoxy form) by methyltransferase. M-2 is formed by hydrolysis at the side chain (omega-1 position) of micanfungin catalyzed by cytochrome P450 (CYP) isoenzymes. Even though micanfungin is a substrate for and a weak inhibitor of CYP2A in vitro, hydrolysis by CYP2A is not a major pathway for micanfungin metabolism in vivo. Micanfungin is neither a P-glycoprotein substrate nor inhibitor in vitro.
In four healthy volunteer studies, the ratio of metabolite to parent (AUC) at a dose of 150 mg/day was 11% for M-1, 1% for M-2, and 6% for M-3. In patients with esophageal candidiasis, the ratio of metabolite to parent (AUC) at a dose of 150 mg/day was 11% for M-1, 2% for M-2, and 12% for M-3.

The correlation of radioactivity following a single intravenous dose of ^{14}C -micanfungin sodium for injection (25 mg) was evaluated in healthy volunteers. At 38 days after administration, mean urinary fecal recovery of total radioactivity accounted for 82.6% (78.4 to 87.9%) of the administered dose. Fecal excretion is the major route of elimination (total radioactivity at 38 days was 71.0% of the administered dose).

Special Populations
Micanfungin disposition has been studied in a variety of populations as described below.

Sex and Gender
In dose adjustment of MYCAMINE is required based on gender or race. After 14 daily doses of 150 mg to healthy subjects, micanfungin AUC in women was greater by approximately 22% compared with men, due to smaller body weight. No notable differences among white, black, and Hispanic subjects were seen. The micanfungin AUC was greater by 20% in Japanese subjects compared to blacks, due to smaller body weight.

Breast Feeding
Micanfungin does not require dose adjustment in patients with renal impairment.

A single 1-hour infusion of 100 mg MYCAMINE was administered to 9 subjects with severe renal dysfunction (creatinine clearance <30 mL/min) and to 9 age-, gender-, and weight-matched subjects with normal renal function (creatinine clearance >30 mL/min). The AUC (0-12 hours) (C_{0-12}) and AUC were not significantly altered by severe renal impairment.

Since micanfungin is highly protein bound, it is not dialyzable. Supplimentary dosing should not be required following hemodialysis.

Renal Impairment
A single 1-hour infusion of 100 mg MYCAMINE was administered to 8 subjects with moderate hepatic dysfunction (Child-Pugh score 7-9) and 8 age-, gender-, and weight-matched subjects with normal renal function. The C_{0-12} and AUC values of micanfungin were lower by approximately 22% in subjects with moderate hepatic dysfunction. This difference in micanfungin pharmacokinetics does not require dose adjustment of MYCAMINE in patients with moderate hepatic impairment. The pharmacokinetics of micanfungin sodium have been studied in patients with severe hepatic insufficiency.

Geriatric
The exposure and disposition of a 50 mg MYCAMINE dose administered as a single 1-hour infusion to 10 healthy subjects aged 66-78 years were not significantly different from those in 10 healthy subjects aged 25-34 years. No dose adjustment is necessary for the elderly.

#	Strength	Form	Inactive ingredients
1	50	INJECTION, POWDER, LYOPHILIZED, FOR SOLUTION (Q4267)	lactose, citric acid, sodium hydroxide
2	100	INJECTION, POWDER, LYOPHILIZED, FOR SOLUTION (Q4267)	lactose, citric acid, sodium hydroxide

Table 1: Pharmacokinetic Parameters of Micanfungin in Adult Patients

Population	N	Dose (mg)	C_{max} (mg/mL)	Pharmacokinetic Parameters (Mean \pm Standard Deviation)		
				AUC ₀₋₁₂ (mg·h/mL)	t _{1/2} (h)	Cl (mL/min/kg)
HIV+ Positive	20	50	5.1 \pm 1.0	54 \pm 13	15.6 \pm 2.8	0.300 \pm 0.043
Patients with EC*	20	100	10.1 \pm 2.6	115 \pm 25	16.9 \pm 4.4	0.301 \pm 0.036
[Day 14 or 21]	14	150	16.4 \pm 5.5	187 \pm 40	15.5 \pm 2.2	0.297 \pm 0.031
per kg						
HSCCT Recipients	8	3	21.1 \pm 2.94	254 \pm 34	14.0 \pm 1.4	0.214 \pm 0.031
[Day 7]	8	4	29.2 \pm 5.2	339 \pm 72	14.7 \pm 3.2	0.234 \pm 0.036
	8	8	33.8 \pm 4.9	479 \pm 157	14.2 \pm 2.6	0.224 \pm 0.064
	8	8	60.8 \pm 26.9	663 \pm 212	17.2 \pm 2.3	0.223 \pm 0.01

* HIV+human immunodeficiency virus
EC = esophageal candidiasis
HSCCT = hematopoietic stem cell transplant

MICROBIOLOGY

Mechanism of Action
Micanfungin, the active ingredient in MYCAMINE, inhibits the synthesis of 1,3-D-glucan, an essential component of fungal cell walls, which is not present in mammalian cells.
Activity in Vitro
Micanfungin exhibited in-vitro activity against *C. albicans*, *C. glabrata*, *C. lusitana*, *C. parapsilosis*, and *C. tropicalis*. Standardized susceptibility testing methods for 1,3-D-glucan synthesis inhibitors have not been established, and the results of susceptibility studies do not correlate with clinical outcome.

Activity in Vivo
Micanfungin sodium has shown activity in both mucosal and disseminated murine models of candidiasis. Micanfungin sodium, administered to immunosuppressed mice in models of disseminated candidiasis prolonged survival and decreased the mycological burden.
Drug Resistance
The potential for development of drug resistance is not known.

INDICATIONS AND USAGE

MYCAMINE is indicated for:
• Treatment of patients with esophageal candidiasis (see CLINICAL STUDIES, MICROBIOLOGY).
• Prophylaxis of *Candida* infections in patients undergoing solid organ transplantation (see CLINICAL STUDIES, MICROBIOLOGY).

NOTE: The efficacy of MYCAMINE against infections caused by fungi other than *Candida* has not been established.

CONTRAINDICATIONS

MYCAMINE is contraindicated in patients with hypersensitivity to any component of this product.

WARNINGS

Isolated cases of serious hypersensitivity (anaphylaxis and anaphylactoid) reactions (including shock) have been reported in patients receiving MYCAMINE. If these reactions occur, MYCAMINE infusion should be discontinued and appropriate treatment administered.

PRECAUTIONS

Hepatic Effects

Laboratory abnormalities in liver function tests have been seen in healthy volunteers and patients treated with MYCAMINE. In some patients with serious underlying conditions who were receiving MYCAMINE along with multiple concomitant medications, clinical hepatic abnormalities have occurred, and isolated cases of significant hepatic dysfunction, hepatitis, or worsening hepatic failure have been reported. Patients who develop abnormal liver function tests during MYCAMINE therapy should be monitored for evidence of worsening renal function.

Renal Effects

Elevation in BUN and creatinine, and isolated cases of significant renal dysfunction or acute renal failure have been reported in patients who received MYCAMINE. In controlled studies, the incidence of drug-induced renal adverse events was 0.4% for MYCAMINE treated patients and 0.6% for fluconazole treated patients. Patients who develop abnormal renal function tests during MYCAMINE therapy should be monitored for evidence of worsening renal function.

Hematological Effects

Acute intravascular hemolysis and hemoglobinuria have been seen in healthy volunteers during infusion of MYCAMINE (2 mg/kg) and oral prednisolone (10 mg/kg). This event was transient, and the subject did not develop significant anemia. Isolated cases of significant hemolytic and hemolytic anemia have been reported in patients treated with MYCAMINE. Patients who develop clinical or laboratory evidence of hemolysis or hemolytic anemia during

MYCAMINE therapy should be monitored closely for evidence of worsening of these conditions and evaluated for the risk/benefit of continuing MYCAMINE therapy.

Drug Interactions

A series of in-vitro drug-drug interaction studies were conducted in healthy volunteers to evaluate the potential for pharmacokinetic interactions between MYCAMINE and cytochrome P450 isoenzymes, tacrolimus, prednisolone, sirolimus, nifedipine, fluconazole, ritonavir, and rifampin. In these studies, no interaction that altered the pharmacokinetics of micanfungin was observed.

There was no significant single dose or multiple doses of MYCAMINE on cytochrome P450 isoenzymes, tacrolimus, prednisolone, and fluconazole pharmacokinetics. Since a previous increase of 13% with single doses of MYCAMINE in the presence of steady-state MYCAMINE compared with sirolimus alone. Nifedipine AUC and C_{max} were increased by 18% and 25%, respectively, in the presence of steady-state MYCAMINE compared with nifedipine alone. Patients receiving sirolimus or nifedipine in combination with MYCAMINE should be monitored for adverse effects of nifedipine and sirolimus or nifedipine dose should be reduced if necessary.

Micanfungin is not an inhibitor of P-glycoprotein and, therefore, would not be expected to alter P-glycoprotein-mediated drug transport activity.

Contraindications and Impairment of Fertility

No life-time studies in animals were performed to evaluate the teratogenic potential of MYCAMINE. Micanfungin sodium was not mutagenic or clastogenic when evaluated in a standard battery of *in vitro* and *in vivo* tests (e.g., bacterial reversion *S. typhimurium*, *S. typhimurium* sister chromatid exchange, chromosome aberrations).

Male rats treated intravenously with micanfungin sodium for 4 weeks showed vacuolation of the epididymal distal epithelial cells at or above 10 mg/kg (about 0.6 times the recommended clinical dose for esophageal candidiasis, based on body surface area comparisons). Higher doses (about twice the recommended clinical dose, based on body surface area comparisons) resulted in higher epididymal weights and reduced number of sperm cells. In a 30-week intravenous study in dogs, seminiferous tubular atrophy and decreased spermatogenesis in the epididymis were observed at 10 and 30 mg/kg. These results equal to about 2 and 7 times the recommended clinical dose, based on body surface area comparisons. There was no impairment of fertility in animal studies with micanfungin sodium.

Pregnancy Category C

Micanfungin sodium administration to pregnant rabbits (intravenous dose of 10 mg/kg on days 14 to 18 of gestation) resulted in visceral abnormalities and abortion at 32 mg/kg, a dose equivalent to about four times the recommended dose based on body surface area comparisons. Visceral abnormalities included abnormal dilation of the lung, liver, and spleen, retroviral ureter, anomalous right subclavian artery, and dilated aorta.

However, adequate, well-controlled studies were not conducted in pregnant women. Animal studies are not always predictive of human experience. Therefore, MYCAMINE should be used during pregnancy only if clearly needed.

Nursing Mothers

Mice treated during the milk of lactating, drug-treated rats. It is not known whether micanfungin is excreted in human milk. Caution should be exercised when MYCAMINE is administered to a nursing woman.

Pediatric Use

The safety and efficacy of MYCAMINE in pediatric patients have been established in clinical studies of MYCAMINE. A total of 186 subjects in clinical studies of MYCAMINE were 18 years of age and older, and 41 subjects were 75 years of age and older. No overall differences in safety or effectiveness were observed between these subjects and younger subjects. Other reported clinical experience has been limited to pediatric patients.

Continued on next page

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Calcium Zinc Oxide	100%
Calcium Hydroxide	100%
Calcium Nitrate	100%
Calcium Oxide	100%
Calcium Phosphate	100%
Calcium Pyrophosphate	100%
Calcium Stearate	100%
Calcium Sulfate	100%
Calcium Tartrate	100%
Calcium Zinc Oxide	100%
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† Daily Value (D.V.) not established.

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of active tuberculosis, including patients who tested negative for latent tuberculosis infection.

phome have been reported in adolescent and young adult patients with Crohn's disease treated with

10 mL of Sterile Water for Injection, USP, the resulting pH is approximately 7.2. Each single-use vial contains 100 mg infliximab, 500 mg sucrose, 0.5 mg polysorbate 80, 2.2 mg

basic sodium phosphate, dihydrate

increasing endothelial layer permeability and expression of adhesion molecules by endothelial cells and leukocytes.

continued on next page

Remicade—Cont.

thereafter through week 22 in Study UC II. In Study UC II, patients were allowed to continue blinded therapy to week 46 at the investigator's discretion.

Patients in Study UC I had failed to respond or were intolerant to oral corticosteroids, 6-mercaptopurine (6-MP), or azathioprine (AZA). Patients in Study UC II had failed to respond or were intolerant to the above treatments and/or aminosalicylates. Similar proportions of patients in Studies UC I and UC II were receiving corticosteroids (61% and 51%, respectively), 6-MP/azathioprine (49% and 43%) and aminosalicylates (70% and 76%) at baseline. More patients in Study UC II than UC I were taking solely aminosalicylates for UC (26% vs 11%, respectively). Clinical response was defined as a decrease from baseline in the Mayo score by $\geq 50\%$ and ≥ 3 points, accompanied by a decrease in the rectal bleeding subscore of ≥ 1 or a rectal bleeding subscore of 0 or 1.

Remission, Clinical Remission, and Mucosal Healing

In both Study UC I and Study UC II, greater percentages of patients in both REMICADE groups achieved clinical response, clinical remission and mucosal healing than in the placebo group. Each of these effects was maintained throughout the end of each trial (week 54 in Study UC I, and week 30 in Study UC II). In both studies, a greater proportion of patients in REMICADE groups demonstrated sustained response and sustained remission than in the placebo groups (Table 9).

Of patients on corticosteroids at baseline, greater proportions of patients in the REMICADE treatment groups were in clinical remission and able to discontinue corticosteroids at week 30 compared with the patients in the placebo treatment groups (22% in REMICADE treatment groups vs 10% in placebo group in Study UC I; 23% in REMICADE treatment groups vs 8% in placebo group in Study UC II). In Study UC I, this effect was maintained through week 54 (21% in REMICADE treatment groups vs 9% in placebo group). The REMICADE-associated response was generally similar in the 5 mg/kg and 10 mg/kg dose groups. (See table 9 at bottom of previous page.)

The improvement with REMICADE was consistent across all Mayo subscores through week 54 (Study UC I shown in Table 10; Study UC II through week 30 was similar).

Table 10
PROPORTION OF PATIENTS IN STUDY UC I WITH MAYO SUBSCORES INDICATING REMISSION OR MILD DISEASE THROUGH WEEK 54

	REMICADE		
	Placebo (n=122)	5 mg/kg (n=121)	10 mg/kg (n=122)
Stool frequency			
Baseline	17%	17%	10%
Week 8	35%	60%	58%
Week 30	35%	51%	53%
Week 54	31%	52%	51%
Rectal bleeding			
Baseline	54%	40%	43%
Week 8	74%	86%	80%
Week 30	61%	73%	71%
Week 54	62%	69%	67%
Physician's global assessment			
Baseline	4%	6%	3%
Week 8	44%	74%	64%
Week 30	36%	61%	57%
Week 54	26%	53%	53%
Endoscopic findings			
Baseline	0%	0%	0%
Week 8	34%	69%	69%
Week 30	26%	51%	52%
Week 54	21%	50%	51%

INDICATIONS AND USAGE

Rheumatoid Arthritis

REMICADE, in combination with methotrexate, is indicated for reducing signs and symptoms, inhibiting the progression of structural damage, and improving physical function in patients with moderately to severely active rheumatoid arthritis.

Crohn's Disease

REMICADE is indicated for reducing signs and symptoms and inducing and maintaining clinical remission in adult and pediatric patients with moderately to severely active Crohn's disease who have had an inadequate response to conventional therapy (see Boxed WARNINGS, WARNINGS, and PRECAUTIONS/Pediatric Use).

REMICADE is indicated for reducing the number of draining enterocutaneous fistulas in adult patients and maintaining fistula closure in adult patients with fistulizing Crohn's disease.

Ankylosing Spondylitis

REMICADE is indicated for reducing signs and symptoms

Plaque Psoriasis

REMICADE is indicated for the treatment of adult patients with chronic severe (i.e., extensive and/or disabling) plaque psoriasis who are candidates for systemic therapy and whom other systemic therapies are not considered to be appropriate. REMICADE should only be administered to patients who will be closely monitored and have regular follow-up visits with a physician (see Boxed WARNINGS, WARNINGS, and PRECAUTIONS).

Ulcerative Colitis

REMICADE is indicated for reducing signs and symptoms, inducing and maintaining clinical remission and mucosal healing, and eliminating corticosteroid use in patients with moderate to severe active ulcerative colitis who have had an inadequate response to conventional therapy.

CONTRAINDICATIONS

REMICADE at doses ≥ 5 mg/kg should not be administered to patients with moderate to severe heart failure. In a randomized study evaluating REMICADE in patients with moderate to severe heart failure (New York Heart Association [NYHA] Functional Class II/IV), REMICADE treatment at 10 mg/kg was associated with an increased incidence of death and hospitalization due to worsening heart failure (see WARNINGS and ADVERSE REACTIONS, Patient Safety). Failure).

REMICADE should not be re-administered to patients who have experienced a severe hypersensitivity reaction to REMICADE. Additionally, REMICADE should not be administered to patients with known hypersensitivity to inactive components of the product or to any murine proteins.

WARNINGS

RISK OF INFECTIONS

(See Boxed WARNINGS)

Serious infections, including sepsis and pneumonia, have been reported in patients receiving TNF-blocking agents. Some of these infections have been fatal, though some may have resulted from opportunistic infections. REMICADE has occurred in patients on concomitant immunosuppressive therapy which in addition to their underlying disease, could further predispose them to infections, such as opportunistic infections, and may have been fatal. REMICADE should not be given to patients with a clinically important, active infection. Caution should be exercised when considering the use of REMICADE in patients with a chronic infection or a history of recurrent infection. Patients should be monitored for signs and symptoms of infection while on or after treatment with REMICADE. New infections should be closely monitored. If a patient develops a serious infection, REMICADE treatment should be discontinued (see ADVERSE REACTIONS: Infections).

Cases of tuberculosis, histoplasmosis, coccidioidomycosis, listeriosis, pneumocystosis, other bacterial, mycobacterial and fungal infections have been observed in patients receiving REMICADE. Patients should be evaluated for tuberculosis risk factors and be tested for latent tuberculosis infection. Treatment of latent tuberculosis infections should be initiated prior to therapy with REMICADE. When tuberculin skin testing is performed for latent tuberculosis infection an induction size of 5 mm or greater should be considered positive, even if vaccinated previously with Bacille Calmette-Guérin (BCG). Patients receiving REMICADE should be monitored closely for signs and symptoms of active tuberculosis, particularly since tests for latent tuberculosis infection may be falsely negative. The possibility of undetected latent tuberculosis should be considered, especially in patients who have immigrated from or traveled to countries with a high prevalence of tuberculosis or had close contact with persons with active tuberculosis. All patients treated with REMICADE should have a thorough history taken prior to initiating therapy. Some patients who have previously received treatment for latent or active tuberculosis have developed active tuberculosis while being treated with REMICADE. Anti-tuberculous therapy should be considered prior to initiation of REMICADE in patients with a past history of latent or active tuberculosis in whom an adequate course of treatment cannot be documented. Anti-tuberculous therapy prior to initiating REMICADE should also be considered in patients who have severe or highly significant risk factors for tuberculosis infection¹⁴ and have a negative test for latent tuberculosis. The decision to initiate anti-tuberculous therapy should be made with caution and only be made following consultation with a physician with expertise in the treatment of tuberculosis and taking into account both the risk for latent tuberculosis infection and the risk of tuberculosis while being treated with REMICADE. For patients who have resided in regions where histoplasmosis or coccidioidomycosis is endemic, the benefits and risks of REMICADE treatment should be carefully considered before initiation of REMICADE therapy.

Patients with active tuberculosis who are treated with concurrent use of anakinra and another TNF-blocking agent, etanercept, with no added clinical benefit compared to etanercept alone. Because of the nature of the adverse events seen with combination of etanercept and anakinra

Rare post-marketing cases of hepatosplenic T-cell lymphoma have been reported in adolescent and young adult patients with Crohn's disease treated with REMICADE. In these reports, the deaths occurred in patients on concomitant treatment with azathioprine or 6-mercaptopurine. The clinical course of this disease is very aggressive with a high outcome in most patients within 2 years of diagnosis. The causal relationship of hepatosplenic T-cell lymphoma to the use of REMICADE remains unclear.

Hepatitis B Virus Reactivation

Use of TNF blockers, including REMICADE, has been associated with reactivation of hepatitis B virus (HBV) in patients with chronic HBV infection. In some cases, these reactivations have been severe, with some cases of HBV reactivation occurring in conjunction with TNF blocker therapy has been fatal. The majority of the reports have occurred in patients concomitantly treated with immunosuppressive therapy. In some cases, HBV may also contribute to HBV reactivation. Patients at risk for HBV infection should be evaluated prior to initiation of HBV infection before initiating TNF blocker therapy. Prescribers should exercise caution in prescribing TNF blockers, including REMICADE, to patients with a history of HBV infection. Adequate data are not available on the safety or efficacy of treating patients who are carriers of HBV with anti-TNF therapy in conjunction with TNF blocker therapy to prevent HBV reactivation. Patients who are carriers of HBV should be closely monitored for signs and symptoms of HBV infection throughout therapy and for several months following termination of therapy. In patients who develop HBV infection, the decision should be made about whether to discontinue therapy with appropriate supportive treatment should be initiated. The safety of continuing TNF blocker therapy after HBV reactivation is controlled is not known. Therefore, prescribers should exercise caution when using long-term treatment of TNF blocker therapy in this situation and monitor patients closely.

Hepatotoxicity

Severe hepatic reactions, including acute liver failure, cholestasis, hepatitis and cholelithiasis have been reported. In some post-marketing data in patients receiving REMICADE, autoimmune hepatitis has been diagnosed in some of these cases. Severe hepatic reactions occurred between two to more than a year after initiation of REMICADE therapy. In some cases, the reactions were fatal. In some cases, the reactions were fatal or necessitated liver transplantation. Patients with symptoms or signs of liver injury, including jaundice, dark urine, anorexia, loss of appetite, or jaundice and/or marked liver enzyme elevations (several times the upper limit of normal) develops, REMICADE should be discontinued, and a thorough investigation of the abnormality should be undertaken. In some cases, the elevation of liver enzymes (ALT and AST) have been observed in patients receiving REMICADE without progression to severe hepatic injury (see ADVERSE REACTIONS: Hepatotoxicity).

Patients with Heart Failure

REMICADE has been associated with adverse outcomes in patients with heart failure, and should be used in patients with heart failure only after consideration of other treatment options. The results of a randomized study evaluating the use of REMICADE in patients with heart failure (NYHA Functional Class II/IV) suggested higher mortality in patients who received 10 mg/kg REMICADE, and higher rates of cardiovascular adverse events at doses of 5 mg/kg and 10 mg/kg. There have been post-marketing reports of worsening heart failure, and some deaths, and ventricular arrhythmias, in patients taking REMICADE. Some deaths have also been rare post-marketing reports of severe heart failure, including heart failure in patients who have known pre-existing heart failure. Some deaths in patients have been under 50 years of age. If a decision is made to administer REMICADE to patients with heart failure, they should be closely monitored during therapy. REMICADE should be discontinued if new or worsening symptoms of heart failure (see CONTRAINDICATIONS and ADVERSE REACTIONS, Patients with Heart Failure) Hematologic Events

Cases of leukopenia, neutropenia, thrombocytopenia, and pancytopenia have been reported in patients receiving REMICADE. The causal relationship to REMICADE therapy remains unclear. Although no high-risk groups) has been identified, caution should be exercised in patients being treated with REMICADE who have a history of significant hematologic abnormalities. All patients should be advised to seek medical attention if they develop signs and symptoms suggestive of blood dyscrasias or infection (e.g., petechiae, bruising, or bleeding). REMICADE Discontinuation: REMICADE therapy should be considered in patients who develop significant hematologic abnormalities.

Hypersensitivity

REMICADE has been associated with hypersensitivity reactions that may occur in patients with or without sensitization in some cases. Most hypersensitivity reactions which include urticaria, dyspnea, and/or hypotension

Trinexon—Cont.

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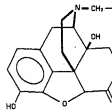
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Shown in Product Identification Guide, page 309

VIVITROL® (naltrexone extended-release injectable suspension) 15
40 mg/mL (naltrexone for extended-release injectable suspension)

DESCRIPTION:

VIVITROL® (naltrexone for extended-release injectable suspension) is supplied as a microsphere formulation of naltrexone for suspension, to be administered by intramuscular injection. Naltrexone is an opioid antagonist with little, if any, opioid agonist activity. Naltrexone is designated chemically as morphinan-6-one, 17, (4S)-[3-((1S,2S)-2-(3,3-dimethyl-1-oxobutyl)-4-methyl-2-phenylbutan-1-yl)-4-methyl-5-oxo-5,6,7,8-tetrahydro-1H-benzofuran-3-yl]-N-methyl-N-(1-methylethyl)-2-propionamido-3-phenylpropanamide, and its molecular weight is 341.41 in the anhydrous form (i.e., $\times 10^{-3}$ molecular weight is 341.41). The structural formula is:



Naltrexone base anhydrous is an off-white to light tan powder with a melting point of 153-174°C (343-353°F). It is insoluble in water and is soluble in ethanol. VIVITROL is provided as a cation containing a vial each of VIVITROL microspheres and diluent, one 5-mL syringe, one 10-mL 20-gauge preparation needle, and two 10-mL 20-gauge administration needles with safety device. VIVITROL microspheres consist of a sterile, off-white to light tan powder that is available in a dosage strength of 380-mg naltrexone per mL. Naltrexone is incorporated in 75.5 polyactide-co-glycolide (PLGA) at a concentration of 337 mg of naltrexone per gram of microspheres. The diluent is a clear, colorless solution. The composition of the diluent includes carboxymethylcellulose sodium salt, polysorbate 20, sodium chloride, and water for injection. The microspheres must be suspended in the diluent prior to injection.

CLINICAL PHARMACOLOGY:

Pharmacodynamics

Mechanism of Action

Naltrexone is an opioid antagonist with highest affinity for the μ opioid receptor. Naltrexone has few, if any, intrinsic actions besides its opioid blocking properties. However, it does produce some pupillary constriction, by an unknown mechanism.

The administration of VIVITROL is not associated with the development of tolerance. Tolerance in subjects physically dependent on opioids, VIVITROL will precipitate withdrawal symptoms.

Occupation of opioid receptors by naltrexone may block the effects of endogenous opioid peptides. The neurobiological

mechanisms responsible for the reduction in alcohol consumption observed in alcohol-dependent patients treated with naltrexone are not fully understood. However, an involvement of the endogenous opioid system is suggested by preclinical data.

Naltrexone blocks the effects of opioids by competitive binding to opioid receptors. This makes the blockade produced potentially surmountable, but overcoming full naltrexone blockade by administration of opioids may result in complete receptor-mediated symptoms such as histamine release.

VIVITROL is not aversive therapy and does not cause a flu-like-like reaction either as a result of opiate use or ethanol ingestion.

Pharmacokinetics

Absorption

VIVITROL is an extended-release, microsphere formulation of naltrexone designed to be administered by intramuscular IM injection every 4 weeks or once a month. After IM (IM) gluteal injection every 4 weeks or once a month, the IM injection, the naltrexone plasma concentration time profile is characterized by a transient initial peak, which occurs approximately 2 hours after injection, followed by a slowly decreasing approximately 2-4 days later. Beginning approximately 14 days after dosing, concentrations slowly decline, with measurable levels for greater than 1 month.

Maximum plasma concentration (C_{max}) and area under the curve (AUC) for naltrexone and 68-naltrexol (the major metabolite) following VIVITROL administration are dose proportional. Compared to daily oral dosing with naltrexone 50 mg over 28 days, VIVITROL exposure is 3 to 4-fold higher following administration of a single dose of VIVITROL 380 mg. Steady state is reached at the end of the dosing interval following the first injection. There is minimal accumulation (<15%) of naltrexone or 68-naltrexol upon repeat administration of VIVITROL.

Distribution

In vitro data demonstrate that naltrexone plasma protein binding is low (21%).

Metabolism

Naltrexone is extensively metabolized in humans. Production of the primary metabolite, 68-naltrexol, is mediated by dihydrodiol dehydrogenase, a cytochrome family of enzymes. The cytochrome P450 system is not involved in naltrexone metabolism. Two other minor metabolites are 2-hydroxy-68-naltrexol and 2-hydroxy-3-methoxy-naltrexone. Naltrexone and its metabolites are also conjugated to form glucuronide products.

Significantly less 68-naltrexol is generated following IM administration of VIVITROL compared to administration of oral naltrexone due to a reduction in first-pass hepatic metabolism.

Elimination

Elimination of naltrexone and its metabolites occurs primarily via urine, with minimal excretion of unchanged naltrexone.

The elimination half-life of naltrexone following VIVITROL administration is 5 to 10 days and is dependent on the erosion of the polymer. The elimination half-life of 68-naltrexol following VIVITROL administration is 5 to 10 days.

Special Populations

Hepatic Impairment. The pharmacokinetics of VIVITROL are not altered in subjects with mild to moderate hepatic impairment (Groups A and B of the Child-Pugh classification). Dose adjustment is not required in subjects with mild or moderate hepatic impairment. VIVITROL pharmacokinetics were not evaluated in subjects with severe hepatic impairment (see PRECAUTIONS).

Renal Impairment. A population pharmacokinetic analysis indicated mild renal impairment (creatinine clearance 30-50 mL/min) had little or no influence on VIVITROL pharmacokinetics and that no dosage adjustment is necessary (see PRECAUTIONS). VIVITROL pharmacokinetics have been evaluated in subjects with moderate and severe renal insufficiency (see PRECAUTIONS).

Gender. In a study in healthy subjects (18 females and 18 males) gender did not influence the pharmacokinetics of VIVITROL.

Age. The pharmacokinetics of VIVITROL have not been evaluated in the geriatric population.

Pediatrics. The pharmacokinetics of VIVITROL have not been evaluated in pediatric populations.

Drug-Drug Interactions

Clinical drug interaction studies with VIVITROL have not been conducted to all adverse drug interactions.

Naltrexone antagonizes the effects of opioid-containing medicines, such as cough and cold remedies, antidiarrheal preparations and opioid analgesics (see PRECAUTIONS).

CLINICAL STUDIES

The efficacy of VIVITROL in the treatment of alcohol dependence was evaluated in a 24-week, placebo-controlled, multi-center, double-blind, randomized trial of alcohol dependence (DSM-IV criteria) outpatients. Subjects were randomly assigned to receive either VIVITROL 380 mg or placebo. Oral naltrexone was not administered prior to the initial or subsequent injections of naltrexone. The primary endpoint was pre-defined to be all subjects to achieve abstinence. Subjects treated with VIVITROL 380 mg demonstrated a greater reduction in days of heavy drinking than those treated with placebo. The mean reduction in days of heavy drinking was 5.5 days for VIVITROL 380 mg and 2.5 days for placebo. The mean reduction in days of heavy drinking was 5.5 days for VIVITROL 380 mg and 2.5 days for placebo.

day for male patients and 4 or more drinks for female patients. Among the subset of patients who were abstinent during the week prior to the first dose of medication, compared with placebo-treated patients, they were more likely to remain abstinent for the remainder of the study. Drinking days and the number of heavy drinking days in this subset, patients treated with VIVITROL were more likely than placebo-treated patients to maintain complete abstinence throughout treatment. The same treatment effects were not evident among the subset of patients who were not abstinent during the week prior to the first dose of medication.

INDICATIONS AND USAGE:

VIVITROL is indicated for the treatment of alcohol dependence in patients who are able to obtain from alcohol a moderate level of satisfaction without drinking. VIVITROL is not intended for use in patients who are unable to obtain from alcohol a moderate level of satisfaction without drinking.

Patients should not be actively drinking at the time of treatment with VIVITROL. Treatment should be part of a comprehensive management program that includes psychological support.

CONTRAINDICATIONS

VIVITROL is contraindicated in:

- Patients receiving opioid analgesics (see PRECAUTIONS).
- Patients with current physiologic opioid dependence (see PRECAUTIONS).
- Patients in acute opiate withdrawal (see WARNINGS).
- Any individual who has failed the naltrexone challenge test or has a positive urine screen for opioids.
- Patients who have previously exhibited hypersensitivity to naltrexone, PLGA, carboxymethylcellulose, or any other components of the diluent.

WARNINGS:

Hepatotoxicity

Naltrexone has the capacity to cause hepatocellular injury when given in excessive doses. VIVITROL is contraindicated in acute hepatitis or liver failure, and its use in patients with chronic liver disease must be carefully considered in light of its hepatotoxic effects.

The margin of separation between the apparently safe doses of naltrexone and the dose causing hepatic injury appears to be only five-fold or less. VIVITROL does not appear to be a hepatotoxin at the recommended doses. However, as with any potent drug, VIVITROL should be used with caution and patients should be monitored for signs and symptoms of acute hepatitis. Use of VIVITROL should be discontinued in the event of symptoms and/or signs of acute hepatitis.

Eosinophilic pneumonia

In clinical trials with VIVITROL, there was one diagnosed case of eosinophilic pneumonia, an eosinophilic pneumonia. Both cases required hospitalization, and resolved after treatment with antibiotics and corticosteroids. Should a person receiving VIVITROL develop progressive dyspnea and hypoxemia, the diagnosis of eosinophilic pneumonia should be considered (see ADVERSE REACTIONS). VIVITROL should be withheld from the risk of eosinophilic pneumonia, and patients with eosinophilic pneumonia should be monitored for signs and symptoms of pneumonia. Clinicians should consider the possibility of eosinophilic pneumonia in patients who are responsive to antibiotics.

Unintended Precipitation of Opioid Withdrawal

To prevent occurrence of an acute abstinence syndrome (withdrawal) in patients dependent on opioids, the following precautions should be observed. Patients with moderate to severe dependence should be opioid-free for a minimum of 7 days before starting VIVITROL treatment. Since the onset of withdrawal symptoms is typically within 12 hours, proof that a patient is opioid-free, a naloxone challenge test should be employed if the prescribing physician has not observed withdrawal reaction following administration of VIVITROL.

Opioid Overdose Following an Attempt to Overcome Opioid Blockade

VIVITROL is not indicated for the purpose of opioid blockade or the treatment of opiate dependence. Although VIVITROL is a potent antagonist with a prolonged duration of action, it is not a true antagonist and is not surmountable. This poses a potential risk to individuals who, on their own, to overcome the blockade by taking additional doses of opioid. Such an attempt by the patient to overcome the antagonism by taking opioids is very dangerous and may lead to fatal overdose. Injury may arise because the plasma concentration of VIVITROL is not decreasing immediately following the first administration may be sufficient to overcome the competitive receptor blockade. As a consequence, the patient may be immediately at risk of suffering the life-threatening opiate intoxication (e.g., respiratory arrest, circulatory collapse). Patients should be told of the serious consequences of trying to overcome the blockade by taking additional doses of opioids.

PATIENTS:

There is also the possibility that a patient who had been treated with VIVITROL will respond to lower doses of opioids than those who have not been treated with VIVITROL. This life-threatening opiate intoxication (respiratory collapse)

or arrest, circulation may be threatened. Patients should be told that they may experience withdrawal symptoms after VIVITROL treatment.

PRECAUTIONS:

General

When Reversal of VIVITROL Management

Patients should be advised of the following:

• A suggested plan for

• In situations requiring

• respiratory distress

• rapidly acting opiate

• respiratory support

• the patient. Non-resp-

• on should be expected e-

• syndrome, or bronch-

• release.

• irrespective of the d-

• the patient, who has

• they trained persons

• cardiopulmonary res-

• Deposition and Sule

• in controlled clinical

• (e.g., naloxone, or o-

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• are common in patients

• should be treated with

• opiate thoughts of

• doubt, but were e-

• sion which began w-

• completed successfully

• with VIVITROL.

• Depression-related e-

• 7450 mg of at stud-

• treated with

• in the 24-week, (0)

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(ed Clinical Studies) hypercholesterolemia (Type IIa; Table 11), response to an appropriate diet, or diet plus drug, has been inadequate.

is indicated as adjunctive therapy for treatment of high patients with very high serum triglyceride levels (Type IV and V hyperlipidemia; Table 11) and a risk of pancreatitis and who do not respond adequately to a determined dietary effort to control them. Such patients typically have serum TG levels of 500 mg/dL and have elevations of VLDL-C as well as elevations of chylomicrons (Type V hyperlipidemia; Table 11). Patients who consistently have total serum cholesterol levels below 1000 mg/dL are unlikely to develop pancreatitis. Therapy with niacin may be considered in those patients with TG elevations between 500 and 800 mg/dL, who have a history of pancreatitis or recurrent abdominal pain typical of pancreatitis.

For patients with TG elevations between 800 and 1000 mg/dL, who have a history of pancreatitis or recurrent abdominal pain typical of pancreatitis, Type IV patients with TG under 1000 mg/dL, or dietary or alcohol indiscretion, convert to treatment with niacin. TG elevations accompanied by dyslipidemia, but the influence of niacin on the risk of pancreatitis in such situations is not adequately studied. Drug therapy is not indicated for patients with Type I hyperlipoproteinemia, who have elevations of chylomicrons and plasma lipoproteins but normal levels of VLDL-C. Inspection of the lipid profile for 4 hours is helpful in distinguishing Type I, IV, and V hyperlipoproteinemias.⁸

When treatment has been achieved, if the TG is still above 500 mg/dL, C-TM HDL-C becomes a target of therapy. Non-HDL-C goals are set as 10% below the LDL-C goals for each risk category.

Management of Hyperlipoproteinemias

Week	Combination tablet of NIASPAN® and lovastatin			NIASPAN®			Lovastatin		
	n*	Dose (mg/mg)	TG	n*	Dose (mg)	TG	n*	Dose (mg)	TG
Baseline	57		174 mg/dL	61		186 mg/dL	61		171 mg/dL
12	47	1000/20	-32%	46	1000	-22%	56	20	-20%
16	45	1000/40	-39%	44	1000	-23%	56	40	-17%
20	42	1500/40	-44%	43	1500	-31%	56	40	-23%
28	42	2000/40	-46%	43	2000	-31%	53	40	-20%

*n = number of patients remaining in trial at each time point

LDL Elevations

LDL-C goals are set as 10% below the LDL-C goals for each risk category.

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Week	Combination tablet of NIASPAN® and lovastatin			NIASPAN®			Lovastatin		
	n*	Dose (mg/mg)	TG	n*	Dose (mg)	TG	n*	Dose (mg)	TG
Baseline	57		174 mg/dL	61		186 mg/dL	61		171 mg/dL
12	47	1000/20	-32%	46	1000	-22%	56	20	-20%
16	45	1000/40	-39%	44	1000	-23%	56	40	-17%
20	42	1500/40	-44%	43	1500	-31%	56	40	-23%
28	42	2000/40	-46%	43	2000	-31%	53	40	-20%

*n = number of patients remaining in trial at each time point

Week	Combination tablet of NIASPAN® and lovastatin			NIASPAN®			Lovastatin		
	n*	Dose (mg/mg)	Lp(a)	n*	Dose (mg)	Lp(a)	n*	Dose (mg)	Lp(a)
Baseline	57		34 mg/dL	61		41 mg/dL	60		42 mg/dL
12	47	1000/20	-9%	46	1000	-8%	56	20	+8%
16	45	1000/40	-9%	44	1000	-12%	56	40	+8%
20	42	1500/40	-17%	43	1500	-22%	53	40	+6%
28	42	2000/40	-22%	41	2000	-32%	52	40	0%

*n = number of patients remaining in trial at each time point

Table 10. NCEP Treatment Guidelines: LDL-C Goals and Outcomes for Therapeutic Lifestyle Changes and Drug Therapy in Different Risk Categories

Risk Category	LDL Goal (mg/dL)	LDL Level at Which to Initiate Therapeutic Lifestyle Changes (mg/dL)	LDL Level at Which to Consider Drug Therapy (mg/dL)
CHD or CHD risk equivalents (10-year risk $\geq 20\%$)	<100	≥ 100	≥ 130 (100-129: drug optional) ¹⁾
2+ Risk factors (10-year risk $\geq 20\%$)	<130	≥ 130	10-year risk 10%-20%: ≥ 130 10-year risk $<10\%$: ≥ 160
0-1 Risk factor ²⁾	<160	≥ 160	≥ 190 (180-189: LDL-lowering drug optional)

¹⁾CHD, coronary heart disease

Some authorities recommend use of LDL-lowering drugs in this category if an LDL-C level of <100 mg/dL cannot be achieved by therapeutic lifestyle changes. Others prefer use of drugs that primarily modify triglycerides and HDL-C, e.g., statins or fibrates. Clinical judgment also may be useful for deferring drug therapy in this category.

²⁾Almost all people with 0-1 risk factor have 10-year risk $<10\%$; thus, 10-year risk assessment in people with 0-1 risk factor is not necessary.

AST and ALT (SGOT and SGPT), should be monitored before treatment begins, every 10 to 12 weeks for the first year, and periodically thereafter (e.g., at approximately 6-month intervals). Special attention should be paid to patients who develop elevated serum transaminase levels, and in these patients, measurements should be repeated promptly and then performed more frequently. If the transaminase levels show evidence of progression, particularly if they rise to 3 times ULN and are persistent, or if they are associated with symptoms of nausea, fever, and/or malaise, the drug should be discontinued.

Rare cases of rhabdomyolysis have been associated with concomitant administration of lipid-lowering doses (at 1 g/day) of niacin and HMG-CoA reductase inhibitors. In clinical studies with a combination tablet of NIASPAN® and lovastatin, no cases of rhabdomyolysis and one suspected case of myopathy have been reported in 1079 patients who were treated with doses up to 2000mg of NIASPAN® and 40mg of lovastatin daily for periods up to 2 years. Physicians contemplating combined therapy with HMG-CoA reductase inhibitors and NIASPAN® should carefully monitor patients for any signs and symptoms of muscle pain, tenderness, or weakness, particularly during the initial months of therapy and during any periods of upward dosage titration of either drug. Periodic serum creatine phosphokinase (CPK) and potassium determinations should be performed in patients receiving this combination, so that any underlying medical problem (see INDICATIONS AND USAGE).

PRECAUTIONS

General

Before instituting therapy with NIASPAN®, an attempt should be made to control hyperlipidemia with appropriate diet, exercise, and weight reduction in obese patients, and to treat other underlying medical problems (see INDICATIONS AND USAGE).

Patients with a past history of jaundice, hepatobiliary disease, or peptic ulcer should be observed closely during NIASPAN® therapy. Frequent monitoring of liver function tests and blood glucose should be performed to ascertain that the drug is producing no adverse effects on these organ systems. Diabetic patients may experience a dose-related

rise in glucose intolerance, the clinical significance of which is unclear. Diabetic or potentially diabetic patients should be observed closely. Adjustment of diet and/or hypoglycemic therapy may be necessary.

Caution should also be used when NIASPAN® is used in patients with unstable angina or in the acute phase of an MI, particularly when such patients are also receiving vasoactive drugs such as nitrates, calcium channel blockers, or adrenergic blocking agents. Elevated uric acid levels have occurred with niacin therapy, therefore use with caution in patients predisposed to gout. NIASPAN® has been associated with small but statistically significant dose-related reductions in platelet count (mean of -11% with 2000mg). In addition, NIASPAN® has been associated with small but statistically significant increases in prothrombin time (mean of approximately $+4\%$); accordingly, patients undergoing surgery should be carefully evaluated. Caution should be observed when NIASPAN® is administered concomitantly with anticoagulants; prothrombin time and platelet counts should be monitored closely in such patients.

In placebo-controlled trials, NIASPAN® has been associated with small but statistically significant, dose-related reductions in phosphorus levels (mean of -13% with 2000mg). Although these reductions were transient, phosphorus levels should be monitored periodically in patients at risk for hypophosphatemia.

Niacin is rapidly metabolized by the liver, and excreted through the kidneys. NIASPAN® is excreted in patients with significant or unexplained hepatic dysfunction (see CONTRAINDICATIONS and WARNINGS) and should be used with caution in patients with renal dysfunction.

Information for Patients

Patients should be advised:

- to take NIASPAN® at bedtime, after a low-fat snack.
- Administration on an empty stomach is not recommended.
- to carefully follow the prescribed dosing regimen, including the recommended titration schedule, in order to minimize side effects (see DOSAGE AND ADMINISTRATION).

Continued on next page

PRODUCT INFORMATION

Gelatin capsule shells contain gelatin, iron oxide (yellow, black, and red), and titanium dioxide. They may also contain benzyl alcohol, carbomethylcellulose sodium, edetate calcium disodium.

CLINICAL PHARMACOLOGY

The mechanism of action of Soriatene is unknown. Pharmacokinetics: Absorption: Oral absorption of acitretin is optimal when taken with food. For this reason, acitretin was given with food in all of the following studies. After administration of a single 50 mg oral dose of acitretin to 18 healthy subjects, maximum plasma concentrations ranged from 196 to 728 ng/mL (mean 416 ng/mL) and were achieved in 2 to 5 hours (mean 3.7 hours). The oral absorption of acitretin is linear and proportional with increasing doses from 25 to 100 mg. Approximately 72% (range 47% to 109%) of the administered dose was absorbed after a single 50 mg dose of acitretin was given to 12 healthy subjects.

Distribution: Acitretin is from 99.9% bound to plasma proteins, primarily albumin.

Metabolism: In humans, acitretin is metabolized by Phase I metabolism.

Excretion: Following oral absorption, acitretin undergoes extensive metabolism and interconversion by simple transformation to the 13-cis form (cis-acitretin). The formation of cis-acitretin relative to parent compound is not altered by dose or fed/fasted conditions of oral administration of acitretin. Both parent compound and isomer are further metabolized into chain-shortened breakdown products and conjugates, which are excreted. Following multiple-dose administration of acitretin, steady-state concentrations of acitretin and cis-acitretin in plasma are achieved within approximately 3 weeks.

Elimination: The chain-shortened metabolites and conjugates of acitretin and cis-acitretin are ultimately excreted in the feces (34% to 54%) and urine (16% to 53%). The terminal elimination half-life of acitretin following multiple-dose administration is 48 hours (range 35 to 96 hours), and after administration under the same conditions is 63 hours (range 28 to 157 hours). The accumulation ratio of the parent compound is 1.2; that of cis-acitretin is 6.6.

Special Populations: Psoriasis: In an 8-week study of acitretin pharmacokinetics in patients with psoriasis, mean steady-state trough concentrations of acitretin increased in a dose proportional manner with dosages ranging from 10 to 50 mg daily. Acitretin plasma concentrations were nonmeasurable (<4 ng/mL) in all patients 3 weeks after cessation of therapy.

Elderly: In a multiple-dose study in healthy young ($n = 6$) and elderly ($n = 8$) subjects, a two-fold increase in acitretin plasma concentrations were seen in elderly subjects, although the elimination half-life did not change.

Renal Failure: Plasma concentrations of acitretin were significantly (59.3%) lower in end-stage renal failure subjects ($n = 6$) when compared to age-matched controls receiving a single 50 mg oral dose. Acitretin was not removed by hemodialysis in these subjects.

Pharmacokinetic Drug Interactions (see also boxed CONTRAINDICATIONS AND WARNINGS AND PRECAUTIONS): Drug Interactions: In studies of in vivo pharmacokinetic drug interactions, no interaction was seen between acitretin and trimethoprim, digoxin, phenprocoumon or glyburide.

Rheumatoid: Clinical evidence has shown that etretinate is retinoid with a much longer half-life, see below can be formed with concurrent use of acitretin.

In a two-way crossover study, all 10 subjects formed etretinate with concurrent ingestion of a single 100 mg oral dose of acitretin during a 5-hour period. The mean peak etretinate concentration of 19 ng/mL (range 12 to 29 ng/mL) was observed, and extrapolation of AUC values indicated that the formation of etretinate in this study was comparable to a single 5 mg oral dose of etretinate.

100 mg oral dose of acitretin was administered without concurrent ethanol ingestion, although the formation of etretinate without concurrent ethanol ingestion cannot be ruled out.

Excretion: Excretion of acitretin and its metabolites was measured in urine (0 to 100 mg/mL), 16% had measurable etretinate levels (>0 ng/mL).

Etretinate has a much longer half-life (10 to 150 hours) than that of acitretin. In one study the apparent mean terminal half-life after 6 months of therapy was approximately 120 days (range 4 to 168 days). In another study of 47 patients treated with etretinate, 5% had detectable serum drug levels (in the range of 0.5 to 12 ng/mL) 21 to 2.9 years after therapy was discontinued. The long half-life appears to be due to storage of etretinate in adipose tissue.

Progestin-only Contraceptives: It has not been established if there is a pharmacokinetic interaction between acitretin and combined oral contraceptives. However, it has been established that acitretin interferes with the contraceptive effect of microdosed progestin preparations. Microdosed oral contraceptives are not recommended for "minipill" progestin preparations.

Contraception: It is recommended that either oral or nonoral contraceptive methods be used during acitretin therapy.

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Timing of Paternal Acitretin Treatment Relative to Conception

At time of conception	5*	5	1	11
Discontinued ~4 weeks prior	0	0	0	1
Discontinued ~6 to 8 months prior	0	1	1*	1

* Four of 5 cases were prospective.

** With malformation pattern not typical of retinoid embryopathy (bilateral cystic hygroma of neck, hypoplasia of lungs bilaterally, pulmonary stricture, VSD with overriding tricus arteriosus).

with 50 mg Soriatene per day showed significant improvements ($p \leq 0.05$) relative to baseline and to placebo in the physician's global evaluation and in the mean ratings of severity of psoriasis (scaling, thickness, and erythema). In Study B, differences from baseline and from placebo were statistically significant ($p \leq 0.05$) for all variables at both the 25 mg and 50 mg doses. It should be noted for Study B that no statistical adjustment for multiplicity was carried out.

Table 1. Summary of the Soriatene Efficacy Results of the 8-Week Double-Blind Phase of Studies A and B

	Study A			Study B		
	Placebo (N=29)	50 mg (N=29)	50 mg (N=29)	Placebo (N=71)	25 mg (N=71)	50 mg (N=71)
Physician's Global Evaluation						
Baseline	4.62	4.55	4.43	4.37	4.49	4.53
Mean Change	-0.29	-2.00*	-0.05	-1.06*	-1.57*	-1.57*
Change After 8 Weeks						
Scaling						
Baseline	4.10	3.76	3.97	4.11	4.10	4.10
Mean Change	-0.22	-1.61*	-0.21	-1.50*	-1.78*	-1.78*
Change After 8 Weeks						
Thickness						
Baseline	4.10	4.10	4.03	4.11	4.21	4.21
Mean Change	-0.39	-2.10*	-0.18	-1.43*	-2.10*	-2.10*
Change After 8 Weeks						
Erythema						
Baseline	4.21	4.59	4.42	4.24	4.45	4.45
Mean Change	-0.33	-2.10*	-0.37	-1.12*	-1.65*	-1.65*
Change After 8 Weeks						

* Values were statistically significantly different from baseline ($p \leq 0.05$). No adjustment for multiplicity was done for Study B.

The efficacy variables consisted of the mean severity ratings of scale, lesion thickness, erythema, and the physician's global evaluation of the current status of the disease. Ratings of scaling, erythema, and lesion thickness, and the ratings of the global assessment were made using a seven-point scale (0 = none, 1 = trace, 2 = mild, 3 = mild-moderate, 4 = moderate, 5 = moderate-severe, 6 = severe).

A subset of 141 patients from both pivotal studies A and B continued to receive Soriatene in an open fashion for up to 24 weeks. At the end of the treatment period, all efficacy variables, as indicated in Table 2, were significantly improved ($p \leq 0.01$) from baseline, including extent of psoriasis, mean ratings of psoriasis severity and physician's global evaluation.

Table 2. Summary of the First Course of Soriatene Therapy (24 Weeks)

	Study A	Study B
Mean Total Daily Soriatene Dose (mg)	42.8	43.1
Mean Duration of Therapy (Weeks)	21.1	22.6
Physician's Global Evaluation		
Baseline	N = 39	N = 98
Mean Change From Baseline	4.51	4.43
	-2.28*	-2.60*
Scaling		
Baseline	N = 59	N = 132
Mean Change From Baseline	3.97	4.07
	-2.15*	-2.14*

* Values were statistically significantly different from baseline ($p \leq 0.05$). No adjustment for multiplicity was done for Study B.

The efficacy variables consisted of the mean severity ratings of scale, lesion thickness, erythema, and the physician's global evaluation of the current status of the disease. Ratings of scaling, erythema, and lesion thickness, and the ratings of the global assessment were made using a seven-point scale (0 = none, 1 = trace, 2 = mild, 3 = mild-moderate, 4 = moderate, 5 = moderate-severe, 6 = severe).

Delivery of Healthy Neonate	5*	5	1	11
Spontaneous Abortion	0	0	0	1
Induced Abortion	0	1	1*	1

* Four of 5 cases were prospective.

** With malformation pattern not typical of retinoid embryopathy (bilateral cystic hygroma of neck, hypoplasia of lungs bilaterally, pulmonary stricture, VSD with overriding tricus arteriosus).

Thickness	N = 59	N = 132
Baseline	4.00	4.12
Mean Change From Baseline	-2.44*	-2.68*
Erythema	N = 59	N = 132
Baseline	4.35	4.53
Mean Change From Baseline	-2.31*	-2.29*

* Indicates that the difference from baseline was statistically significant ($p \leq 0.01$).

The efficacy variables consisted of the mean severity ratings of scale, lesion thickness, erythema, and the physician's global evaluation of the current status of the disease. Ratings of scaling, erythema, and lesion thickness, and the ratings of the global assessment were made using a seven-point scale (0 = none, 1 = trace, 2 = mild, 3 = mild-moderate, 4 = moderate, 5 = moderate-severe, 6 = severe).

All efficacy variables improved significantly in a subset of 55 patients from Study A treated for a second, 6-month maintenance course of therapy (for a total of 12 months of treatment): a small subset of patients ($n = 4$) from Study A continued to improve after a third 6-month course of therapy (for a total of 18 months of treatment).

INDICATIONS AND USAGE

Soriatene is indicated for the treatment of severe psoriasis in adults. Because of significant adverse effects associated with its use, Soriatene should be prescribed only by those physicians who are experienced in the use of retinoids. In females of reproductive potential, Soriatene should be reserved for non-pregnant patients who are unresponsive to other therapies or whose clinical condition contraindicates the use of other treatments (see boxed CONTRAINDICATIONS AND WARNINGS—Soriatene can cause severe birth defects). Most patients experience relapse of psoriasis after discontinuation of therapy. Subsequent courses, when clinically indicated, have produced efficacy results similar to the initial course of therapy.

CONTRAINDICATIONS

Pregnancy Category X (see boxed CONTRAINDICATIONS AND WARNINGS).

Soriatene is contraindicated in patients with severely impaired liver or kidney function and in patients with clinically elevated blood lipid values (see boxed WARNINGS: Hypotension, WARNINGS: Lipids and Possible Cardiovascular Effects, and PRECAUTIONS).

An increased risk of hepatic failure has been reported to result from combined use of methotrexate and etretinate. Consequently, the combination of methotrexate with Soriatene is contraindicated (see PRECAUTIONS: Drug Interactions).

Since both Soriatene and tetracyclines can cause increased intracranial pressure, their combined use is contraindicated (see WARNINGS: Pseudotumor Cerebri).

Soriatene is contraindicated in cases of hypersensitivity to the preparation (acitretin or excipients) or to other retinoids.

WARNINGS

(see also boxed CONTRAINDICATIONS AND WARNINGS)

Hepatotoxicity. Of the 525 patients treated in US clinical trials, 2 had clinical jaundice with elevated serum bilirubin and transaminases considered related to Soriatene treatment. Liver function test results in these patients returned to normal.

Two of the 1228 patients treated in European clinical trials developed biopsy-confirmed toxic liver disease.

A second biopsy in one of these patients revealed moderate chronic hepatitis suggestive of cirrhosis. One patient in a Canadian clinical trial of 63 patients developed a three-fold increase of transaminases. A liver biopsy of this patient showed mild to moderate fatty liver.

Local hepatic effects and mild to moderate fatty liver were compatible with acute reversible hepatic injury. The patient's transaminases returned to normal 2 months after Soriatene was discontinued.

The potential of Soriatene therapy to induce hepatotoxicity was prospectively evaluated in a liver biopsy study in 128 patients treated for 12 weeks.

Pre- and posttreatment biopsies were available for 87 patients. A comparison of liver biopsy findings before and after therapy revealed 43 (50%) patients showed

Albumin—Cont.

ment in the bottle. Do not begin administration more than 4 hours after the container has been entered. Discard unused portion.

PRECAUTIONS

ALBUMIN (HUMAN) U.S.P., ALBUMIN® should be administered with caution to patients with low cardiac reserve.

Rapid infusion may cause vascular overload with resultant pulmonary edema. Patients should be closely monitored for signs of increased venous pressure.

A rapid rise in blood pressure following infusion necessitates careful observation of injured or postoperative patients to detect and treat severed blood vessels that may not have bled at a lower pressure.

Patients with marked dehydration require administration of additional fluids. **ALBUMIN®** may be administered with the usual isotonic and saline intravenous solutions. However, solutions containing protein hydrolyzates or alcohol should not be infused through the same administration set in conjunction with **ALBUMIN®** since these combinations may cause the proteins to precipitate.

Pregnancy Category C. Animal reproduction studies have not been conducted with Albumin (Human). It is also not known whether Albumin (Human) can cause fetal harm when administered to a pregnant woman or can affect reproduction capacity. Albumin (Human) should be given to a pregnant woman only if clearly needed.

ADVERSE REACTIONS

Allergic or pyrogenic reactions are characterized primarily by fever and chills; rash, nausea, vomiting, tachycardia and hypotension have also been reported. Should an adverse reaction occur, slow or stop the infusion for a period of time which may result in the disappearance of the symptoms. If administration has been stopped and the patient requires additional **ALBUMIN (HUMAN) U.S.P., ALBUMIN®**, material from a different lot should be used. **ALBUMIN®**, particularly if administered rapidly, may result in vascular overload with resultant pulmonary edema.

DOSAGE AND ADMINISTRATION

ALBUMIN® is administered intravenously. The total dosage will vary with the individual. In adults, an initial infusion of 100 mL is suggested. Subsequent amounts may be administered as clinically indicated.

In the treatment of the patient in shock with greatly reduced blood volume, **ALBUMIN®** may be administered as rapidly as necessary in order to improve the clinical condition and restore normal blood volume. This may be repeated in 15–30 minutes if the initial dose fails to prove adequate. The patient with a slightly low or normal blood volume, the rate of administration should be 1 mL per minute. If dilution of **Albumin® 25%** is clinically desired, compatible diluents include 0.9% Sodium Chloride solution or sterile 5% Dextrose in Water.*

Pediatric Use: The pediatric use of **ALBUMIN (HUMAN) U.S.P., ALBUMIN®**, has not been clinically evaluated. The dosage will vary with the clinical state and body weight of the individual. Historically, a dose one-quarter to one-half the adult dose may be administered, or dosage may be calculated on the basis of 0.6 to 1.0 gram per kilogram of body weight (2.4 to 4 mL of **ALBUMIN® 25%**). For jaundiced infants suffering from hemolytic disease of the newborn the appropriate dose for binding of free bilirubin is 1.0 gram per kilogram of body weight which may be administered during the procedure. The usual rate of administration in children should be one-quarter the adult rate. Parenteral drug products should be inspected visually for particulate matter and discoloration prior to administration, whenever solution and container permit.

DIRECTIONS FOR USE: **ALBUMIN (HUMAN) U.S.P., ALBUMIN®** is 100 mL.

When an Administration Set is Used
 Flip of plastic cap on top of the vial and expose rubber stopper. Cleanse exposed rubber stopper with suitable germicidal solution, being sure to remove any excess. Observe aseptic technique and prepare sterile intravenous equipment as follows:

1. Close clamp on administration set.
2. With bottle upright, thrust piercing pin straight through stopper fluid. Do not twist or angle.
3. Immediately insert bottle to automatically establish proper flow level in drip chamber (half full).
4. Attach infusion set to administration set, open clamp and flush solution to expel air from tubing and needle, then close clamp.
5. Make venipuncture and adjust flow.
6. Discard all administration equipment after use. Discard any unused contents.

When an Administration Set is Not Used
 Flip of plastic cap on top of the vial and expose rubber stopper. Cleanse exposed rubber stopper with suitable germicidal solution, being sure to remove any excess. Observe aseptic technique and prepare sterile intravenous equipment as follows:

1. Using aseptic technique, attach filter needle to a sterile disposable plastic syringe.
2. Insert filter needle into **ALBUMIN (HUMAN) U.S.P., ALBUMIN® 25%**.
3. Aspirate **ALBUMIN (HUMAN) U.S.P., ALBUMIN® 25%** solution from the vial into the syringe.
4. Remove and discard the filter needle from the syringe.

5. Attach desired size needle to syringe.
6. Discard all administration equipment after use. Discard any unused contents.

HOW SUPPLIED

1. 50 mL vial **ALBUMIN (HUMAN) U.S.P., ALBUMIN® 25%** Solution.
2. 100 mL vial **ALBUMIN (HUMAN) U.S.P., ALBUMIN® 25%** Solution.

STORAGE

ALBUMIN® is stable for three years providing storage temperature does not exceed 30 °C. Protect from freezing. Re only.

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Shown in Product Identification Guide, page 317

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 (914) 524-6800
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CLEARFACES**OTC****DRUG FACTS**

Active ingredients Purpose
 Glycerin 0.25% Lubricant
 Naphazoline hydrochloride 0.012% Redness reliever

USES

- relieves redness of the eye due to minor eye irritation
- for use as a protectant against further irritation or dryness of the eye
- for the temporary relief of burning and irritation due to dryness of the eye

WARNINGS

- For external use only**
 Do not use if solution changes color or becomes cloudy
 Ask a doctor before use if you have narrow angle glaucoma
When using this product
- to avoid contamination, do not touch tip to any surface
 - replace cap after using
 - overuse may produce increased redness of the eye
 - pupils may become enlarged temporarily
 - Stop use and ask a doctor if:
 - you feel eye pain
 - you experience changes in vision
 - you experience continued redness or irritation of the eye
 - the condition worsens or persists for more than 72 hours
- Keep out of reach of children. If swallowed, get medical help or contact a Poison Control Center right away.

DIRECTIONS

Instill 1 to 2 drops in the affected eye(s) up to 4 times daily.
Other information

- store at room temperature
- use product contains benzalkonium chloride • Tamper evident. Do not use if seal broken in bottle is broken or missing.

Inactive ingredients benzalkonium chloride, boric acid, edate disodium, purified water, sodium borate

Questions? 1-877-274-1787 www.clearfaces.com

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GLEEVEC®
 (glee-VEE) (imatinib mesylate)
 tablets for oral use

HIGHLIGHTS OF PRESCRIBING INFORMATION

The following prescribing information is based on official labeling as of September 2007. These highlights do not include all the information needed to use Gleevec safely and effectively. See full prescribing information for Gleevec.

GLEEVEC (imatinib mesylate) tablets for oral use

Initial U.S. Approval: 2001

----- RECENT MAJOR CHANGES -----
 Indications and Usage: Ph+ CML (Pediatrics) (1.3), Ph+ ALL (1.4), MDS/MPD (1.5), ASM (1.6), HES/CML (1.7), DFSF (1.8) 12/2006
 Dosage and Administration: Ph+ CML (Pediatrics) (2.2), Ph+ ALL (2.3), MDS/MPD (2.4), ASM (2.5), HES/CML (2.6), DFSF (2.7) 12/2006

Warnings and Precautions: Severe Cognitive/Heart Failure and Ventricular Dysfunction (5.4) 12/2006

----- INDICATIONS AND USAGE -----
 Gleevec is a kinase inhibitor indicated for the treatment of:

- Newly diagnosed adult patients with Philadelphia chromosome positive chronic myeloid leukemia (Ph+ CML) in chronic phase. Follow up is limited to 5 years (1.1)
- Patients with Philadelphia chromosome positive chronic myeloid leukemia (Ph+ CML) in blast crisis (BC, accelerated phase (AP), or in chronic phase (CP) after failure of interferon-alpha therapy (1.2)
- Pediatric patients with Ph+ CML in chronic phase who are newly diagnosed or whose disease has recurred after stem cell transplant or who are resistant to interferon-alpha therapy. There are no controlled trials in pediatric patients demonstrating a clinical benefit, such as improvement in disease-related symptoms or increased survival (1.3)

• Adult patients with relapsed or refractory Philadelphia chromosome positive acute lymphoblastic leukemia (Ph+ ALL) (1.4)

• Adult patients with myeloblastic/platelet/myeloproliferative diseases (MDS/MPD) associated with PDGFR (platelet-derived growth factor receptor) gene re-arrangements (1.5)

• Adult patients with aggressive systemic mastocytosis (ASM) without the D816V c-KIT mutation or with c-KIT mutation status unknown (1.6)

• Adult patients with hypereosinophilic syndrome (HES) and/or chronic eosinophilic leukemia (CEL) who have the FIP1L1-PDGFR fusion kinase (mutational analysis and FISH demonstration of CHIC2 allele deletion) and for patients with HES and/or CEL who are FIP1L1-PDGFR fusion kinase negative or unknown (1.7)

• Adult patients with unresectable, recurrent and/or metastatic dermatofibrosarcoma protuberans (DFSP) (1.8)

• Patients with KIT (CD117) positive unresectable and/or metastatic malignant gastrointestinal stromal tumors (GIST). The effectiveness of Gleevec in GIST is based on objective response rate. There are no controlled trials demonstrating a clinical benefit, such as improvement in disease-related symptoms or increased survival. (1.9)

----- DOSAGE AND ADMINISTRATION -----

• Adults with Ph+ CML CP (2.1): 400 mg/day
 Adults with Ph+ CML AP or BC (2.2): 600 mg/day

• Pediatrics with Ph+ CML (2.3): 340 mg/m²/day or 280 mg/m²/day

• Adults with Ph+ ALL (2.4): 600 mg/day
 Adults with MDS/MPD (2.4): 400 mg/day

• Adults with ASM (2.5): 100 mg/day or 400 mg/day
 Adults with HES/CEL (2.6): 100 mg/day or 400 mg/day

• Adults with DFSF (2.7): 400 mg/day
 Adults with GIST (2.8): 400 mg/day or 600 mg/day

• Patients with mild to moderate hepatic impairment (2.9): 400 mg/day
 Patients with severe hepatic impairment (2.9): 300 mg/day

All doses of Gleevec should be taken with a meal and a full glass of water. Doses of 400 mg or 600 mg should be administered once daily, whereas a dose of 800 mg should be administered as 400 mg twice a day. Gleevec can be dissolved in water or apple juice for patients having difficulty swallowing. Daily dosing of 800 mg and above should be accomplished using the 400 mg tablet to reduce exposure to iron.

DOSAGE FORMS AND STRENGTHS
 Tablets (scored): 100 mg and 400 mg (3)

----- CONTRAINDICATIONS -----

None (4)

